

# Exhibit I



William R. Poynter, Esq.  
757-238-6383  
wpoynter@kaleolegal.com

October 16, 2023

**VIA ELECTRONIC MAIL & UPS**

Shady Tawil, CEO  
MOZAICO, INC.  
1591 Lighthouse Drive  
Naperville, Illinois, 60565  
[info@mozaico.com](mailto:info@mozaico.com)  
[sales@mozaico.com](mailto:sales@mozaico.com)

With a copy to:  
Legalinc Corporate Services Inc.  
651 N. Broad Street.  
Suite 201  
Middletown, DE 19709

**Re: Continued Willful Intellectual Property Infringement**

Dear Sir:

This firm represents New Ravenna, which is America's premier designer and manufacturer of stone and glass mosaic tiles for both residential and commercial installations. New Ravenna's mosaic tile designs are sold through nearly 200 exclusive designer showrooms across the country and internationally, and the company provides design services along with on-site supervision of installations. New Ravenna mosaics have been featured in national architectural and interior design magazines and are found in homes, restaurants, hotels, casinos and businesses around the world.

New Ravenna is the exclusive owner of all copyrights and other intellectual property rights in the mosaic tile designs and marks that appear on the New Ravenna website at [www.newravenna.com](http://www.newravenna.com) ("New Ravenna Designs"). As a result of New Ravenna's exclusive and widespread advertising, use and promotion over more than thirty years, the New Ravenna Designs are widely recognized by consumers as a designation of New Ravenna's goods and services, and New Ravenna has developed extensive goodwill in its New Ravenna Designs. What is more, New Ravenna created and registered the Amaranth design (the "Copyrighted Work"). Plaintiff is the owner of valid and subsisting United States Copyright Registration No. VA0002321514 for the Copyrighted Work. **Exhibit A.**

On several prior occasions, going back as far as 2015 and attached as **Exhibit B**, New Ravenna has attempted to amicably resolve your continued intellectual property infringement. It has, yet again, come to our attention that you are offering another New Ravenna design, Amaranth, without authorization. You are displaying New Ravenna's Amaranth design on both your Facebook and Instagram accounts. **Exhibit C; Exhibit D.**

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We remind you of our prior demand and Mozaico Inc.'s obligations that Mozaico and its affiliates and any and all officers, employees, members, managers, consultants, agents, attorneys, and representatives, take action to preserve all potentially relevant documents and information, regardless of the form in which it is stored, and electronically stored information and to prevent the intentional or accidental deletion or spoliation of any evidence that in any manner relates to this case and the allegations that have been raised.

New Ravenna has attempted to resolve these matters with you on several occasions to no avail. We are placing you on notice of this final attempt to contact you regarding your repeated and willful infringement of New Ravenna's copyrights. If we do not hear from you within seven (7) days, we will proceed with the filing of a lawsuit.

Very truly yours,



William R. Poynter

cc: Alexandra M. Gabriel (agabriel@kaleolegal.com)  
New Ravenna, LLC

# EXHIBIT A

Type of Work: Visual Material

Registration Number / Date:  
VA0002321514 / 2022-09-12

Application Title: Amaranth.

Title: Amaranth.

Description: Electronic file (eService)

Copyright Claimant:  
New Ravenna, LLC.

Date of Creation: 2022

Date of Publication:  
2022-04-14

Nation of First Publication:  
United States

Authorship on Application:  
New Ravenna, LLC, employer for hire; Domicile: United States. Authorship: 2-D artwork.

Rights and Permissions:  
William R. Poynter, Kaleo Legal, 4456 Corporation Ln,  
Suite135, Virginia Beach, VA, 23462, United States,  
(757) 679-3503, wpoynter@kaleolegal.com

Names: New Ravenna, LLC

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## EXHIBIT B



**William R. Poynter**  
Office 757.238.6383  
Fax 757.304.6175  
wpoynter@kaleolegal.com

**Tina Bingham**  
Office 757.963.7261  
Fax 757.304.6175  
tbingham@kaleolegal.com

**Brian Wainger**  
Office 757.965.6804  
Fax 757.304.6175  
bwainger@kaleolegal.com

May 12, 2015

**VIA OVERNIGHT MAIL**

MOZAICO  
1591 Lighthouse Drive  
Naperville, Illinois, 60565

**Re: Trademark and Copyright Infringement**

Dear Sir:

This firm represents New Ravenna Mosaics, which is America's premier designer and manufacturer of stone and glass mosaic tiles for both residential and commercial installations. New Ravenna Mosaics are sold through nearly 200 exclusive designer showrooms across the country and internationally, and the company provides design services along with on-site supervision of installations. New Ravenna Mosaics have been featured in national architectural and interior design magazines and are found in homes, restaurants, hotels, casinos and businesses around the world.

New Ravenna is the exclusive owner of all copyrights and other intellectual property rights in the mosaic tile designs and marks that appear on the New Ravenna website at [www.newravenna.com](http://www.newravenna.com) ("New Ravenna Designs"). As a result of New Ravenna's exclusive and widespread advertising, use and promotion over more than twenty years, the New Ravenna Designs are widely recognized by consumers as a designation of New Ravenna's goods and services, and New Ravenna has developed extensive goodwill in its New Ravenna Designs.

It has come to our attention that you are offering mosaic tile designs that are identical and/or substantially similar to many of the New Ravenna Designs. Below is a complete list of those designs with the New Ravenna Design name on the left and your reference number on the right:

Climbing Vine	MP 189
Climbing Vine	MP 189A
Climbing Vine	MP 189B
Waterworks Parramore Ringlet	MG288
Waterworks Parramore Razmatazz	MG287
Oasis	MP023
Paul Schatz Avila	MP024
Erin Adams Forks,Knives,Spoons	MP025
Tamara	MP027
Erin Adams Bottles	MP028
Edie	MP029

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Mozaico  
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Paul Schatz Reina  
Waterworks Parramore Oval Overlay  
Waterworks Parramore Razmatazz  
Paisley Vine

MP030  
MSA305  
MSA308  
MG324

Because you do not have permission from New Ravenna, your use of the New Ravenna Designs constitutes copyright infringement under The Copyright Act, 17 USC § 101 et al., and potentially trade dress infringement and unfair competition under the Lanham Act, 15 USC § 1125, as well. As a result of this conduct, New Ravenna is entitled to preliminary and permanent injunctive relief against your continued use of the New Ravenna Designs, in addition to recovering its damages and costs, and potentially trebled damages and attorney fees.

We therefore demand that you immediately cease all uses of the New Ravenna Designs, and any other New Ravenna designs or intellectual property, within seven days of receipt of this letter, and confirm in writing that you have done so, including the removal of all references to New Ravenna or its designs from all advertising, promotional materials, in store displays, and websites. We also demand that you confirm your agreement in writing never to use the New Ravenna Designs, trade dress, trademarks, or other intellectual property by signing below. If we do not receive written confirmation within seven days, we will advise our client to pursue all legal remedies available to it.

New Ravenna appreciates your respect for its intellectual property. Please contact me as soon as possible to discuss resolution of this matter. I look forward to hearing from you.

Very truly yours,



William R. Poynter

SEEN AND AGREED:

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Mozaico

cc: New Ravenna Mosaics  
Brian A. Wainger, Esq.  
Tina P. Bingham, Esq.





William R. Poynter, Esq.  
757-238-6383  
wpoynter@kaleolegal.com

January 16, 2018

**VIA OVERNIGHT MAIL**

MOZAICO  
1591 Lighthouse Drive  
Naperville, Illinois, 60565

**Re: Willful Trademark and Copyright Infringement**

Dear Sir:

This firm represents New Ravenna Mosaics, which is America's premier designer and manufacturer of stone and glass mosaic tiles for both residential and commercial installations. New Ravenna Mosaics are sold through nearly 200 exclusive designer showrooms across the country and internationally, and the company provides design services along with on-site supervision of installations. New Ravenna Mosaics have been featured in national architectural and interior design magazines and are found in homes, restaurants, hotels, casinos and businesses around the world.

New Ravenna is the exclusive owner of all copyrights and other intellectual property rights in the mosaic tile designs and marks that appear on the New Ravenna website at [www.newravenna.com](http://www.newravenna.com) ("New Ravenna Designs"). As a result of New Ravenna's exclusive and widespread advertising, use and promotion over more than twenty years, the New Ravenna Designs are widely recognized by consumers as a designation of New Ravenna's goods and services, and New Ravenna has developed extensive goodwill in its New Ravenna Designs.

New Ravenna has previously informed you of your infringement of several of its copyrighted designs, by letter dated May 12, 2015, which was returned signed and acknowledged by your company (a copy of which is enclosed as Exhibit B). Unfortunately, it has again come to our attention that you are offering a multitude of mosaic tile designs that are identical and/or substantially similar to many of the New Ravenna Designs. Attached hereto as Exhibit A is a complete list of those designs together with the online locations where each can be found.

Because you do not have permission from New Ravenna, your use of the New Ravenna Designs set forth on Exhibit A constitutes copyright infringement under The Copyright Act, 17 USC § 101 et al., and potentially trade dress infringement and unfair competition under the Lanham Act, 15 USC § 1125, as well. As a result of this conduct, New Ravenna is entitled to preliminary and permanent injunctive relief against your continued use of the New Ravenna Designs, in addition to recovering its damages and costs. What is more, because of the nature of the infringement, and the fact that Mozaico is now a serial and willful infringer of so many New Ravenna Designs, New Ravenna will be entitled to recover trebled damages and attorney fees in any lawsuit to enforce its rights.

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We therefore demand that you immediately cease all uses of the New Ravenna Designs, and any other New Ravenna designs or intellectual property, within seven days of receipt of this letter, and confirm in writing that you have done so, including the removal of all references to New Ravenna or its designs from all advertising, promotional materials, in store displays, and websites. We also demand that you confirm your agreement in writing never to use the New Ravenna Designs, trade dress, trademarks, or other intellectual property by signing below. If we do not receive written confirmation within seven days, we will advise our client to pursue all legal remedies available to it.

New Ravenna appreciates your respect for its intellectual property. Please contact me as soon as possible to discuss resolution of this matter. I look forward to hearing from you.

Very truly yours,



William R. Poynter

SEEN AND AGREED:

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Mozaico

cc: New Ravenna Mosaics  
William P. Dickinson, III, Esq.



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## EXHIBIT A





Products found at the following locations:

Mosaico website: [www.mozaico.com](http://www.mozaico.com)

Mosaico Instagram: [www.instagram.com/mozaico](https://www.instagram.com/mozaico)





MOSAICO	NEW RAVENNA	PRODUCT INFO
		<p>Mozaico:            Blue Bird in Petal            MP026            Web:  <a href="https://www.mozaico.com/collections/birds-and-butterflies/products/mosaics-designs_birds-and-butterflies_mosaic-tile-art-blue-bird-in-petal_mp026">https://www.mozaico.com/collections/birds-and-butterflies/products/mosaics-designs_birds-and-butterflies_mosaic-tile-art-blue-bird-in-petal_mp026</a>            Instagram:            1. <a href="https://www.instagram.com/p/BR_h0wigvaK/?taken-by=mozaico">https://www.instagram.com/p/BR_h0wigvaK/?taken-by=mozaico</a>            2. <a href="https://www.instagram.com/p/BAgu5dwA6jX/?taken-by=mozaico">https://www.instagram.com/p/BAgu5dwA6jX/?taken-by=mozaico</a>            3. <a href="https://www.instagram.com/p/kq7aOag6g9/?taken-by=mozaico">https://www.instagram.com/p/kq7aOag6g9/?taken-by=mozaico</a>            4. <a href="https://www.instagram.com/p/Bc_qEMxFhpH/?taken-by=mozaico">https://www.instagram.com/p/Bc_qEMxFhpH/?taken-by=mozaico</a></p> <p>New Ravenna: Chinoiserie  <a href="http://newravenna.photoshelter.com/image/I0000jvhiQHeqhj0">http://newravenna.photoshelter.com/image/I0000jvhiQHeqhj0</a></p>
		<p>Mozaico:            Birds and Florals            GA019  <a href="https://www.mozaico.com/collections/birds-and-florals/products/mosaics-designs_birds-and-florals_mosaic-tile-art-birds-and-florals_ga019">https://www.mozaico.com/collections/birds-and-florals/products/mosaics-designs_birds-and-florals_mosaic-tile-art-birds-and-florals_ga019</a></p>

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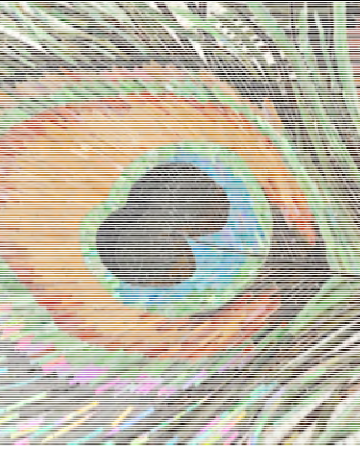


		<p><a href="#">ns/birds-and-butterflies/products/mosaics-designs_birds-and-butterflies_mosaic-designs-birds-and-florals_ga019</a></p> <p>New Ravenna: Chinoiserie <a href="http://newravenna.photoshelter.com/image/I0000h3awkG5NZ9E">http://newravenna.photoshelter.com/image/I0000h3awkG5NZ9E</a></p>
		<p>Mozaico: Zilij Geometric Flower MP199 Web: <a href="https://www.mozaico.com/collectio ns/patterns/products/mosaics-designs_patterns_zillij-geometric-flower-patterns-mosaic-stone-art_mp199">https://www.mozaico.com/collectio ns/patterns/products/mosaics-designs_patterns_zillij-geometric-flower-patterns-mosaic-stone-art_mp199</a> Instagram: <a href="https://www.instagram.com/p/Bc5ZhDSFXjL/?taken-by=mozaico">https://www.instagram.com/p/Bc5ZhDSFXjL/?taken-by=mozaico</a></p> <p>New Ravenna: Granada <a href="http://newravenna.photoshelter.com/image/I0000pgce3G3VET8">http://newravenna.photoshelter.com/image/I0000pgce3G3VET8</a></p>
		<p>Mozaico: Patterned Floral Mosaic Design MG316 Web: <a href="https://www.mozaico.com/collectio ns/patterns/products/mosaics-designs_patterns_patterned-floral-">https://www.mozaico.com/collectio ns/patterns/products/mosaics-designs_patterns_patterned-floral-</a></p>



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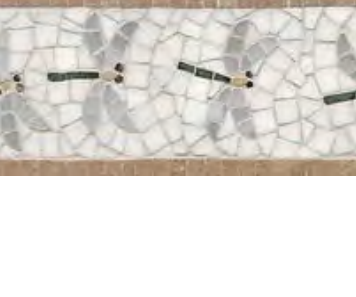
		<p><a href="#">design-on-marble-mosaic-tile-art_mg316</a> Instagram: <a href="https://www.instagram.com/p/BY_ZbuxFUDk/?taken-by=mozaico">https://www.instagram.com/p/BY_ZbuxFUDk/?taken-by=mozaico</a></p> <p>New Ravenna: Marabel <a href="http://newravenna.photoshelter.com/image/I0000iMpiLC2qilQ">http://newravenna.photoshelter.com/image/I0000iMpiLC2qilQ</a></p>
		<p>Mozaico: Stone Mosaic Design – Catch the Wave MSA314 Web: <a href="https://www.mozaico.com/collections/patterns/products/mosaics-designs_patterns_stone-mosaic-design-catch-the-wave_msa314">https://www.mozaico.com/collections/patterns/products/mosaics-designs_patterns_stone-mosaic-design-catch-the-wave_msa314</a> Instagram: <a href="https://www.instagram.com/p/BbcrRsfl9cS/?taken-by=mozaico">https://www.instagram.com/p/BbcrRsfl9cS/?taken-by=mozaico</a></p> <p>New Ravenna: Mirage <a href="http://newravenna.photoshelter.com/image/I0000HGnqcVO43Mk">http://newravenna.photoshelter.com/image/I0000HGnqcVO43Mk</a></p>
		<p>Mozaico: Peacock Feather Micro Mosaic M1008 <a href="https://www.mozaico.com/collections/others/products/mosaics-designs_others_peacock-feather-">https://www.mozaico.com/collections/others/products/mosaics-designs_others_peacock-feather-</a></p>

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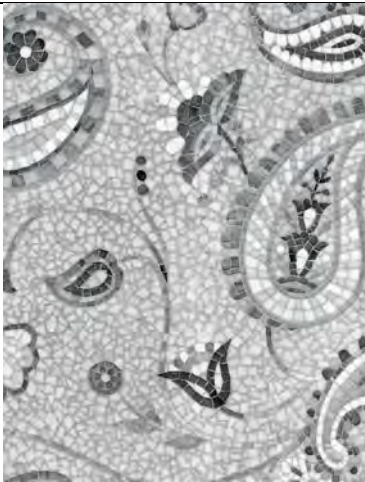
		<p><a href="#">micro-mosaic-stone-artwork-mural_mi008</a></p> <p>New Ravenna: Peacock <a href="http://newravenna.photoshelter.com/image/I0000kPbQ_5RPn4I">http://newravenna.photoshelter.com/image/I0000kPbQ_5RPn4I</a></p>
		<p>Mozaico: Flower Mosaic Square – Nalia MG326 Web: <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_flower-mosaic-square-nalia_mg326">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_flower-mosaic-square-nalia_mg326</a> Instagram: 1. <a href="https://www.instagram.com/p/BQlu9FpASQu/?taken-by=mozaico">https://www.instagram.com/p/BQlu9FpASQu/?taken-by=mozaico</a> 2. <a href="https://www.instagram.com/p/yY-r5hg6pe/?taken-by=mozaico">https://www.instagram.com/p/yY-r5hg6pe/?taken-by=mozaico</a></p> <p>New Ravenna: Aurelia <a href="http://newravenna.photoshelter.com/image/I00003GEoUX0LrKA">http://newravenna.photoshelter.com/image/I00003GEoUX0LrKA</a></p>
		<p>Mozaico: Mosaic Designs – Moonchild MG341 Web: <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_moonchild_mg341">https://www.mozaico.com/collections/geometric/products/mosaics-designs_moonchild_mg341</a></p>



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		<p><a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_mosaic-designs-moonchild_mg341">ns/geometric/products/mosaics-designs_geometric_mosaic-designs-moonchild_mg341</a> Instagram: <a href="https://www.instagram.com/p/BPAv2akITBT/?taken-by=mozaico">https://www.instagram.com/p/BPAv2akITBT/?taken-by=mozaico</a></p>
		<p>New Ravenna: Perrault <a href="http://newravenna.photoshelter.com/image/I0000bf7Gmm2zE6M">http://newravenna.photoshelter.com/image/I0000bf7Gmm2zE6M</a></p> <p>Mozaico: Abstract Mosaic Art – Roman Floral MP189 <a href="https://www.mozaico.com/collections/patterns/products/mosaics-designs_flowers-and-trees_abstract-mosaic-art-roman-floral_mp189">https://www.mozaico.com/collections/patterns/products/mosaics-designs_flowers-and-trees_abstract-mosaic-art-roman-floral_mp189</a></p>
		<p>New Ravenna: Climbing Vine <a href="http://newravenna.photoshelter.com/image/I0000wvQlrx93Do">http://newravenna.photoshelter.com/image/I0000wvQlrx93Do</a></p> <p>Mozaico: Dragonflies MB045 <a href="https://www.mozaico.com/collections/borders/products/mosaics-designs_borders_mosaic-patterns-dragonflies_mb045">https://www.mozaico.com/collections/borders/products/mosaics-designs_borders_mosaic-patterns-dragonflies_mb045</a></p>
		<p>New Ravenna: Dragonflies border <a href="http://newravenna.photoshelter.com/image/I0000woB9x.q2xJQ">http://newravenna.photoshelter.com/image/I0000woB9x.q2xJQ</a></p> <p>Mozaico: Mosaic Designs – Bottles Pattern MP028 <a href="https://www.mozaico.com/collections/patterns/products/mosaics-designs_patterns_mosaic-designs-bottles-pattern_mp028">https://www.mozaico.com/collections/patterns/products/mosaics-designs_patterns_mosaic-designs-bottles-pattern_mp028</a></p>

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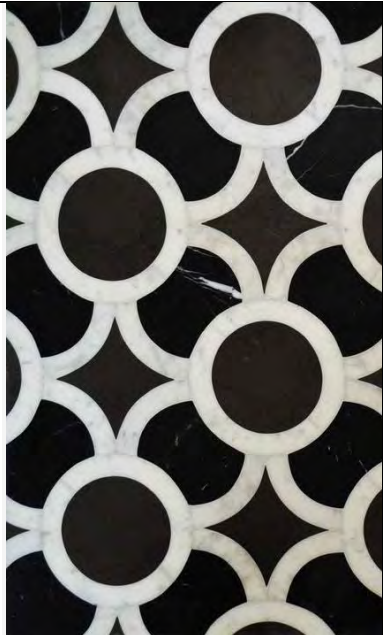





		<p>New Ravenna: Bottles <a href="http://newravenna.photoshelter.com/image/I0000Ln56lIdfu9g">http://newravenna.photoshelter.com/image/I0000Ln56lIdfu9g</a></p>
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		<p>Mozaico: Mosaic Designs: Black Iznik MP201 <a href="https://www.mozaico.com/collections/geometric/products/mosaics-">https://www.mozaico.com/collections/geometric/products/mosaics-</a></p>






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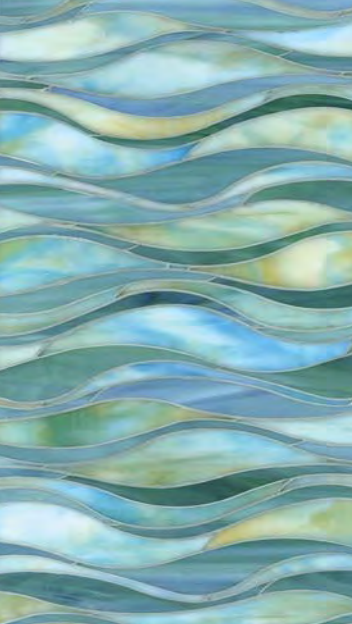


		<p><a href="#">designs_geometric_mosaic-designs-black-iznik_mp201</a></p> <p>New Ravenna: Ann Sacks Beau Monde Montgomery  <a href="http://newravenna.photoshelter.com/image/I0000.OCeEliwwgM">http://newravenna.photoshelter.com/image/I0000.OCeEliwwgM</a></p>
		<p>Mozaico: White Iznik MP200  <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_mosaic-designs-white-iznik_mp200">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_mosaic-designs-white-iznik_mp200</a></p> <p>New Ravenna: Ann Sacks Beau Monde Coco  <a href="http://newravenna.photoshelter.com/image/I0000oO82QFArCJQ">http://newravenna.photoshelter.com/image/I0000oO82QFArCJQ</a></p>
		<p>Mozaico: Mosaic Pattern: Bright Amaryllis MF459  <a href="https://www.mozaico.com/collections/flowers-and-trees/products/mosaics-">https://www.mozaico.com/collections/flowers-and-trees/products/mosaics-</a></p>

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		<p><a href="#">designs flowers-and-trees_mosaic-pattern-bright-amaryllis_mf459</a></p> <p>New Ravenna: Tamsin <a href="http://newravenna.photoshelter.com/image/I0000ycovrzWrSgo">http://newravenna.photoshelter.com/image/I0000ycovrzWrSgo</a></p>
		<p>Mozaico: Moroccan Floral Pattern Petal Design MP030 <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_moroccan-floral-pattern-petal-mosaic-design_mp030">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_moroccan-floral-pattern-petal-mosaic-design_mp030</a></p> <p>New Ravenna: Reina <a href="http://newravenna.photoshelter.com/image/I00006CP6xEVWb10">http://newravenna.photoshelter.com/image/I00006CP6xEVWb10</a></p>
		<p>Mozaico: Pietra Dura Mosaic Wallpaper Modern Floral Pattern MP024 <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_pietra-dura-mosaic-wallpaper-modern-floral-pattern_mp024">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_pietra-dura-mosaic-wallpaper-modern-floral-pattern_mp024</a></p> <p>New Ravenna: Avila <a href="http://newravenna.photoshelter.com/image/I0000odjdy_dveH4">http://newravenna.photoshelter.com/image/I0000odjdy_dveH4</a></p>



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		<p>Mozaico: Waves Petal Mosaic Design                      MP023  <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_waves-petal-mosaic-design_mp023">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_waves-petal-mosaic-design_mp023</a></p> <p>New Ravenna: Oasis  <a href="http://newravenna.photoshelter.com/image/I0000h2SEagqtf8Q">http://newravenna.photoshelter.com/image/I0000h2SEagqtf8Q</a></p>
		<p>Mozaico: Floral Mosaic Black and White Wallpaper                      MP027  <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_floral-mosaic-black-and-white-wallpaper_mp027">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_floral-mosaic-black-and-white-wallpaper_mp027</a></p> <p>New Ravenna: Tamara  <a href="http://newravenna.photoshelter.com/image/I0000eRwlynM12cw">http://newravenna.photoshelter.com/image/I0000eRwlynM12cw</a></p>
		<p>Mozaico: Geometric Mosaic Pattern – Orlandia                      MG360  <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_geometric-mosaic-pattern-orlandia_mg360">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_geometric-mosaic-pattern-orlandia_mg360</a></p>

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Mozaico  
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		<p>New Ravenna: Luxor <a href="http://newravenna.photoshelter.com/image/I0000woBpOhcF4yo">http://newravenna.photoshelter.com/image/I0000woBpOhcF4yo</a></p>
		<p>Mozaico: Mosaic Square Accent – Florencia MP215 <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_mosaic-square-accent-florencia_mp215">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_mosaic-square-accent-florencia_mp215</a></p> <p>New Ravenna: Talya Rumi <a href="http://newravenna.photoshelter.com/image/I00006vyxkZXHPLg">http://newravenna.photoshelter.com/image/I00006vyxkZXHPLg</a></p>
		<p>Mozaico: Floral Pattern Petal Tile Mural MP029 Web: <a href="https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_floral-pattern-petal-tile-mural_mp029">https://www.mozaico.com/collections/geometric/products/mosaics-designs_geometric_floral-pattern-petal-tile-mural_mp029</a> Instagram: <a href="https://www.instagram.com/p/pJMI LNq6qb/?taken-by=mozaico">https://www.instagram.com/p/pJMI LNq6qb/?taken-by=mozaico</a></p>



January 16, 2018

Mozaico

Page 13

		<p>New Ravenna: Edie <a href="http://newravenna.photoshelter.com/image/I0000COI1XDhLma8">http://newravenna.photoshelter.com/image/I0000COI1XDhLma8</a></p>
		<p>Mozaico: unnamed Instagram: <a href="https://www.instagram.com/p/mDP59eg6ik/?taken-by=mozaico">https://www.instagram.com/p/mDP59eg6ik/?taken-by=mozaico</a> New Ravenna: Forks, Knives, Spoons <a href="http://newravenna.photoshelter.com/image/I0000Vy.L3WUzC.8">http://newravenna.photoshelter.com/image/I0000Vy.L3WUzC.8</a></p>

# EXHIBIT B



**William R. Poynter**  
Office 757.238.6383  
Fax 757.304.6175  
wpoynter@kaleolegal.com

**Tina Bingham**  
Office 757.963.7261  
Fax 757.304.6175  
tbingham@kaleolegal.com

**Brian Wainger**  
Office 757.965.6804  
Fax 757.304.6175  
bwainger@kaleolegal.com

May 12, 2015

## VIA OVERNIGHT MAIL

**MOZAICO**  
1591 Lighthouse Drive  
Naperville, Illinois, 60565

### **Re: Trademark and Copyright Infringement**

Dear Sir:

This firm represents New Ravenna Mosaics, which is America's premier designer and manufacturer of stone and glass mosaic tiles for both residential and commercial installations. New Ravenna Mosaics are sold through nearly 200 exclusive designer showrooms across the country and internationally, and the company provides design services along with on-site supervision of installations. New Ravenna Mosaics have been featured in national architectural and interior design magazines and are found in homes, restaurants, hotels, casinos and businesses around the world.

New Ravenna is the exclusive owner of all copyrights and other intellectual property rights in the mosaic tile designs and marks that appear on the New Ravenna website at [www.newravenna.com](http://www.newravenna.com) ("New Ravenna Designs"). As a result of New Ravenna's exclusive and widespread advertising, use and promotion over more than twenty years, the New Ravenna Designs are widely recognized by consumers as a designation of New Ravenna's goods and services, and New Ravenna has developed extensive goodwill in its New Ravenna Designs.

It has come to our attention that you are offering mosaic tile designs that are identical and/or substantially similar to many of the New Ravenna Designs. Below is a complete list of those designs with the New Ravenna Design name on the left and your reference number on the right:

Climbing Vine	MP 189
Climbing Vine	MP 189A
Climbing Vine	MP 189B
Waterworks Parramore Ringle	MG288
Waterworks Parramore Razmatazz	MG287
Oasis	MP023
Paul Schatz Avila	MP024
Erin Adams Forks,Knives,Spoons	MP025
Tamara	MP027
Erin Adams Bottles	MP028
Edie	MP029

May 12, 2015  
Mozaico  
Page 2

Paul Schatz Reina	MP030
Waterworks Parramore Oval Overlay	MSA305
Waterworks Parramore Razmatazz	MSA308
Paisley Vine	MG324

Because you do not have permission from New Ravenna, your use of the New Ravenna Designs constitutes copyright infringement under The Copyright Act, 17 USC§ 101 et al., and potentially trade dress infringement and unfair competition under the Lanham Act, 15 USC § 1125, as well. As a result of this conduct, New Ravenna is entitled to preliminary and permanent injunctive relief against your continued use of the New Ravenna Designs, in addition to recovering its damages and costs, and potentially trebled damages and attorney fees.

We therefore demand that you immediately cease all uses of the New Ravenna Designs, and any other New Ravenna designs or intellectual property, within seven days of receipt of this letter, and confirm in writing that you have done so, including the removal of all references to New Ravenna or its designs from all advertising, promotional materials, in store displays, and websites. We also demand that you confirm your agreement in writing never to use the New Ravenna Designs, trade dress, trademarks, or other intellectual property by signing below. If we do not receive written confirmation within seven days, we will advise our client to pursue all legal remedies available to it.

New Ravenna appreciates your respect for its intellectual property. Please contact me as soon as possible to discuss resolution of this matter. I look forward to hearing from you.

Very truly yours,



William R. Poynter

SEEN AND AGREED:



Mozaico

cc: New Ravenna Mosaics  
Brian A. Wainger, Esq.  
Tina P. Bingham, Esq.



William R. Poynter, Esq.  
757-238-6383  
wpoynter@kaleolegal.com

April 6, 2020

**VIA ELECTRONIC MAIL**

Chady Tawil, CEO  
MOZAICO  
1591 Lighthouse Drive  
Naperville, Illinois, 60565  
info@mozaico.com

**Re: Willful Trademark and Copyright Infringement**

Dear Sir:

This firm represents New Ravenna, which is America's premier designer and manufacturer of stone and glass mosaic tiles for both residential and commercial installations. New Ravenna mosaic tile designs are sold through nearly 200 exclusive designer showrooms across the country and internationally, and the company provides design services along with on-site supervision of installations. New Ravenna mosaics have been featured in national architectural and interior design magazines and are found in homes, restaurants, hotels, casinos and businesses around the world.

New Ravenna is the exclusive owner of all copyrights and other intellectual property rights in the mosaic tile designs and marks that appear on the New Ravenna website at [www.newravenna.com](http://www.newravenna.com) ("New Ravenna Designs"). As a result of New Ravenna's exclusive and widespread advertising, use and promotion over more than twenty years, the New Ravenna Designs are widely recognized by consumers as a designation of New Ravenna's goods and services, and New Ravenna has developed extensive goodwill in its New Ravenna Designs. What is more, the Avila Design is covered by Copyright Registration No. VA0002085265, and the Reina Design is covered by Copyright Registration No. VA0002164004.

New Ravenna has previously informed you of your infringement of several of its copyrighted designs, on two separate occasions dating back to May 12, 2015. Unfortunately, it has again come to our attention that you are offering a multitude of mosaic tile designs that are identical and/or substantially similar to many of the New Ravenna Designs. Attached hereto as Exhibit A is a complete list of those designs together with the online locations where each can be found.

Because you do not have permission from New Ravenna, your use of the New Ravenna Designs set forth on Exhibit A constitutes copyright infringement under The Copyright Act, 17 USC § 101 et al., and potentially trade dress infringement and unfair competition under the Lanham Act, 15 USC § 1125, as well. As a result of this conduct, New Ravenna may be entitled to preliminary and permanent injunctive relief against your continued use of the New Ravenna Designs, in addition to recovering its damages and costs. What is more, because of the nature of the infringement, and the fact that Mozaico is a serial and willful infringer of so many New Ravenna Designs, New Ravenna may be entitled to recover trebled damages and attorney fees in any lawsuit to enforce its rights.



April 6, 2020  
Mozaico  
Page 2

We therefore demand that you immediately cease all uses of the New Ravenna Designs, and any other New Ravenna designs or intellectual property, within seven days of receipt of this letter, and confirm in writing that you have done so, including the removal of all references to New Ravenna or its designs from all advertising, promotional materials, in store displays, and websites. We also demand that you confirm your agreement in writing never to use the New Ravenna Designs, trade dress, trademarks, or other intellectual property by signing below. If we do not receive written confirmation within seven days, we will advise our client to pursue all legal remedies available to it.

New Ravenna appreciates your respect for its intellectual property. Please contact me as soon as possible to discuss resolution of this matter. I look forward to hearing from you.

Very truly yours,



William R. Poynter

SEEN AND AGREED:

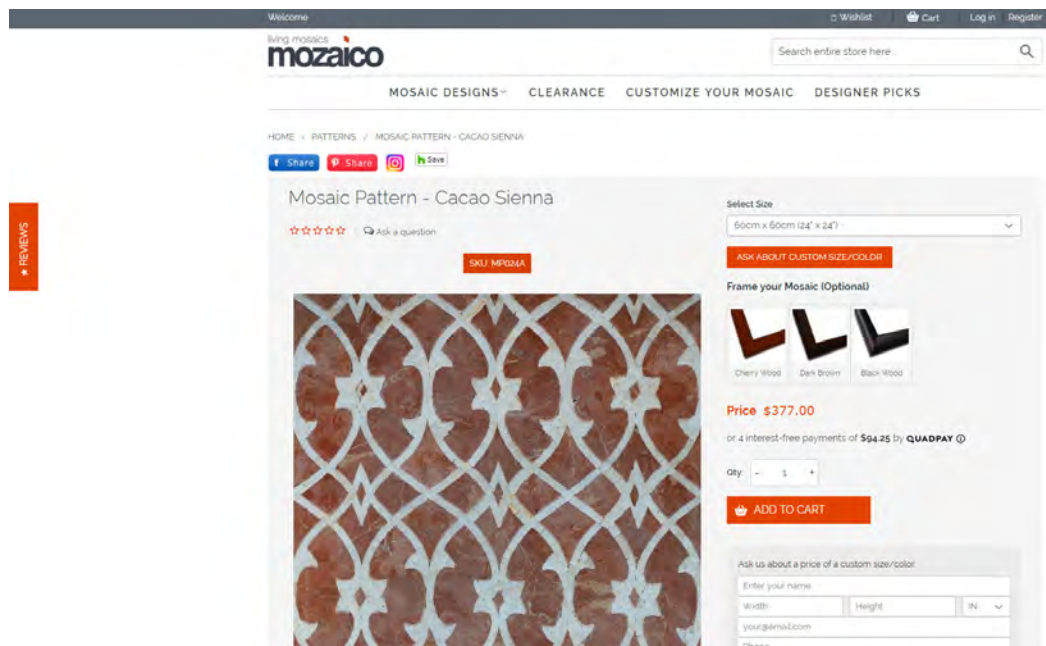
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Mozaico

cc: New Ravenna, LLC

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

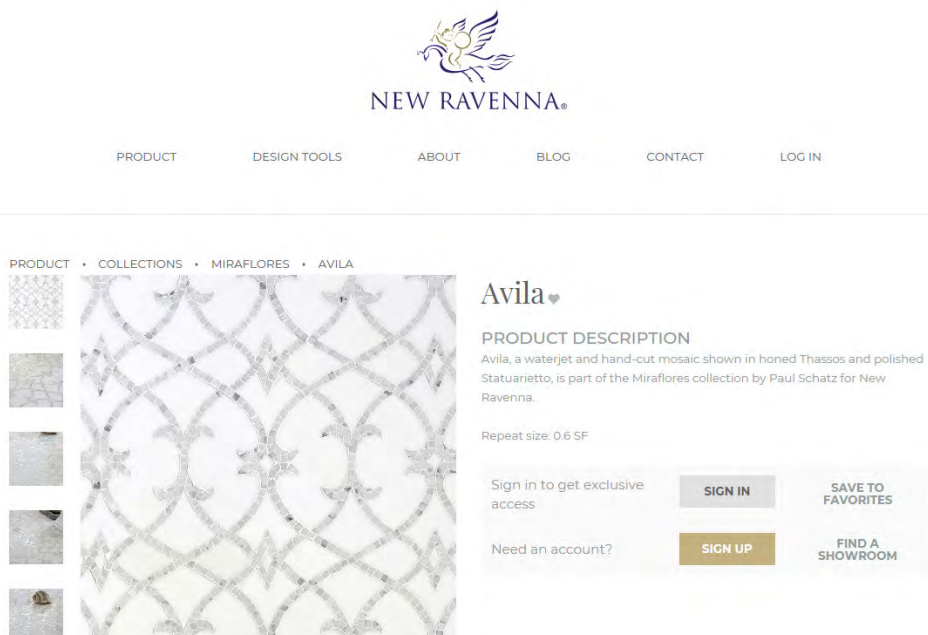
MOZAICO VERSION



LINK:

[https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs\\_patterns\\_mosaic-pattern-cacao-sienna\\_mp024a](https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_patterns_mosaic-pattern-cacao-sienna_mp024a)

NEW RAVENNA VERSION - AVILA

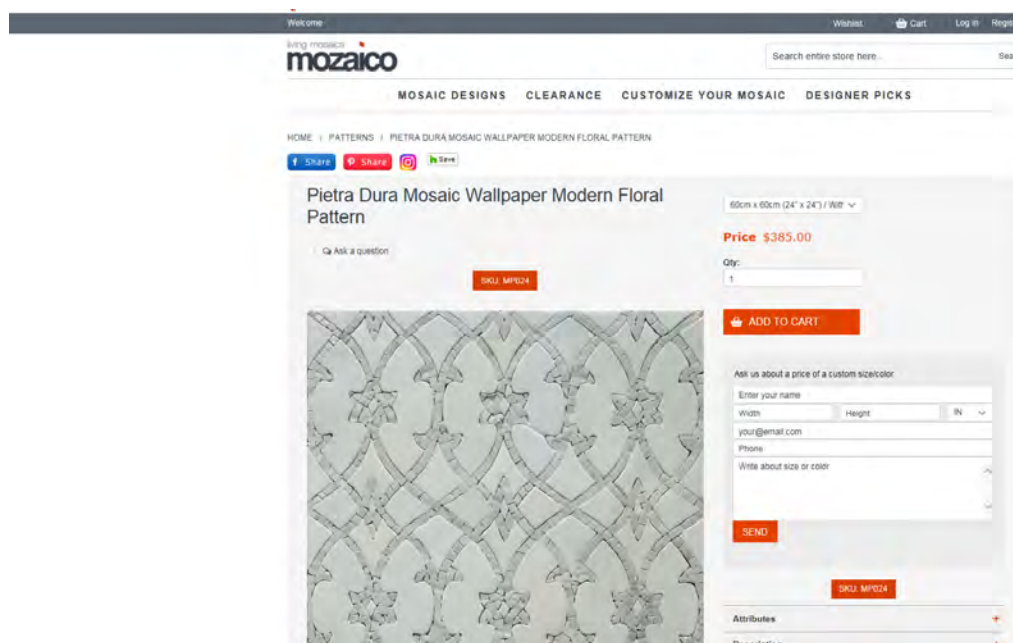


LINK:

<https://newravenna.com/nr-product/avila-statuarietto/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

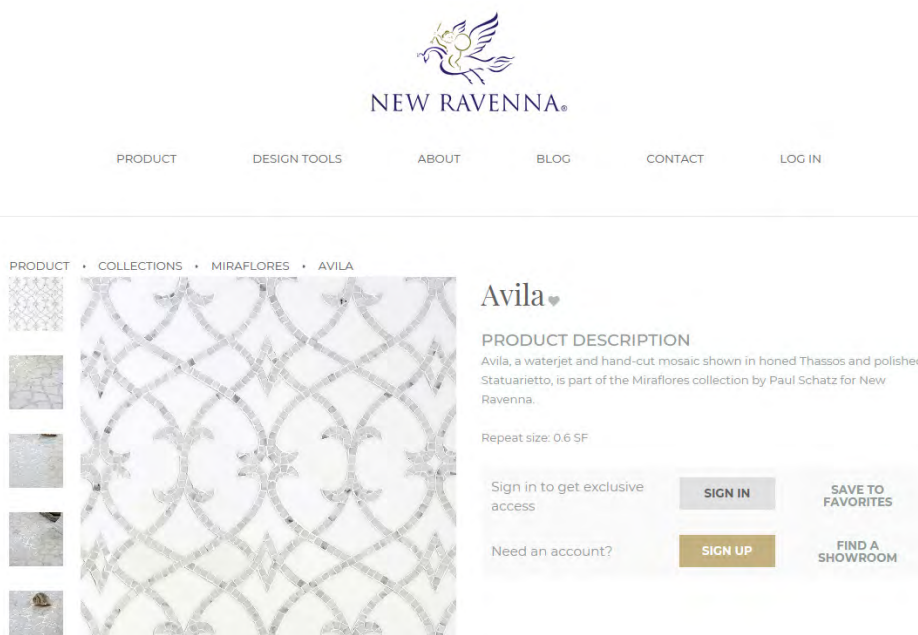
## MOZAICO VERSION



LINK:

[https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs\\_geometric\\_pietra-dura-mosaic-wallpaper-modern-floral-pattern\\_mp024](https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_geometric_pietra-dura-mosaic-wallpaper-modern-floral-pattern_mp024)

## NEW RAVENNA VERSION - AVILA

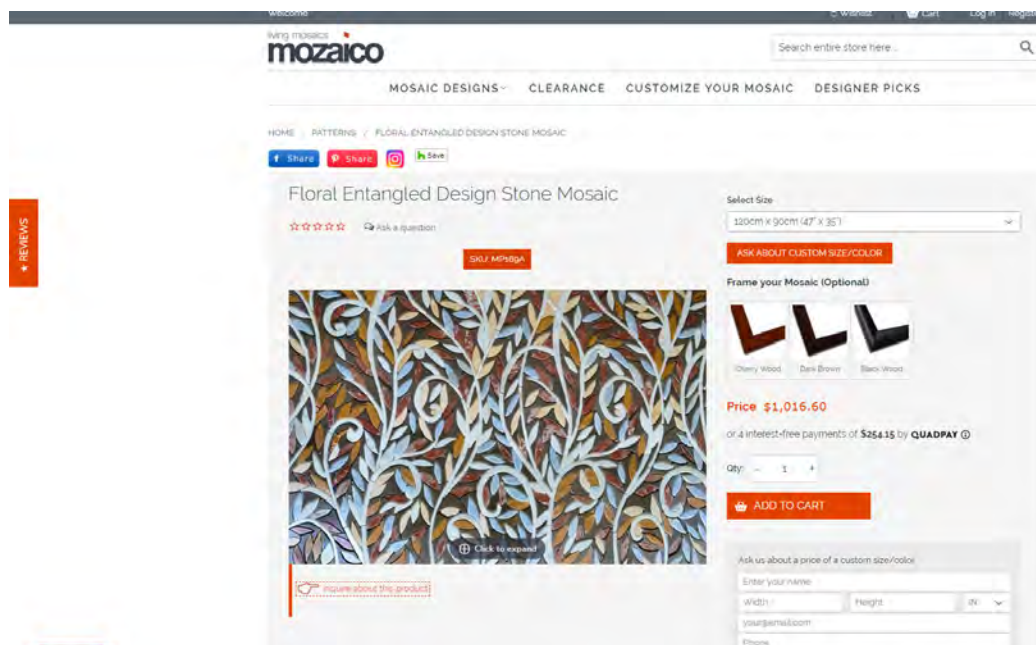


LINK:

<https://newravenna.com/nr-product/avila-statuarietto/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

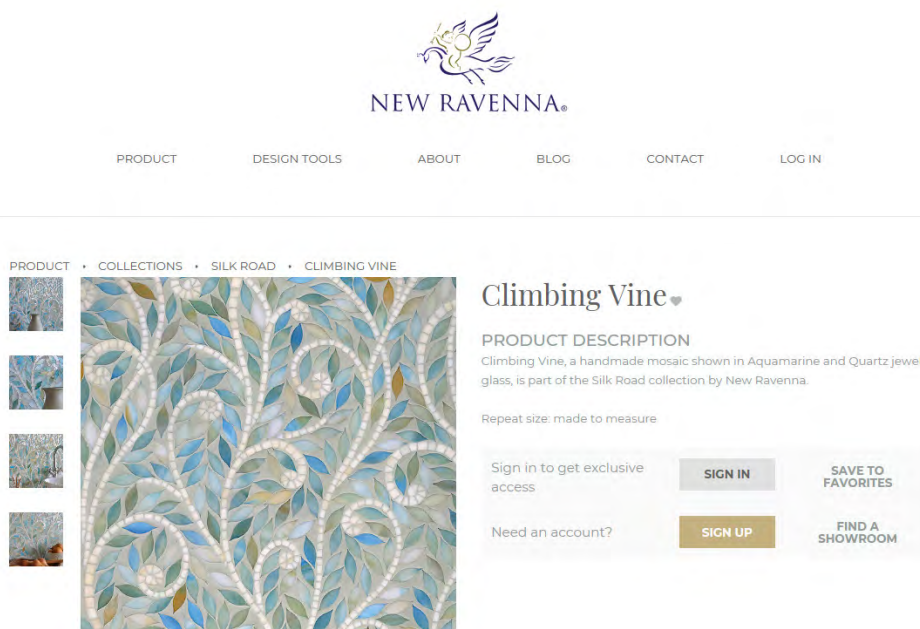
## MOZAICO VERSION



LINK:

<https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs-flowers-and-trees-floral-entangled-design-stone-mosaic-mp189a>

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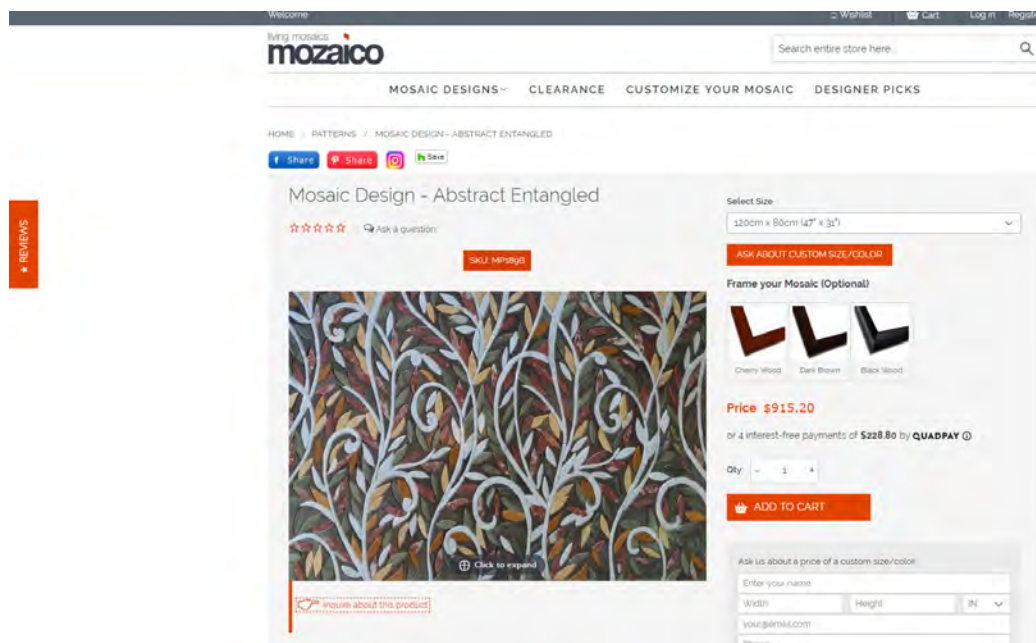
LINK:

<https://newravenna.com/nr-product/climbing-vine-aquamarine/>



PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

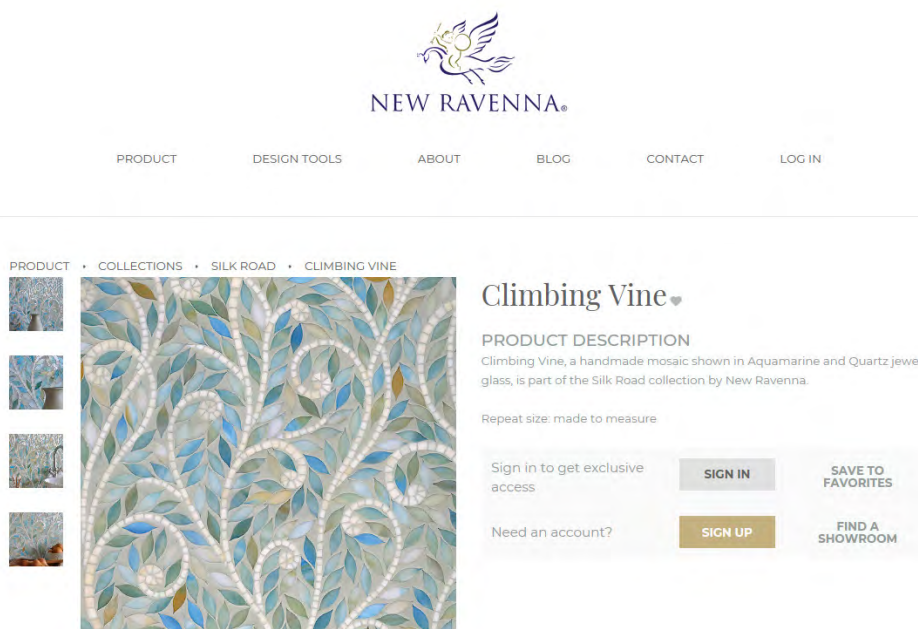
## MOZAICO VERSION



LINK:

<https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs-flowers-and-trees-mosaic-design-abstract-entangled-mp189b>

## NEW RAVENNA VERSION - CLIMBING VINE

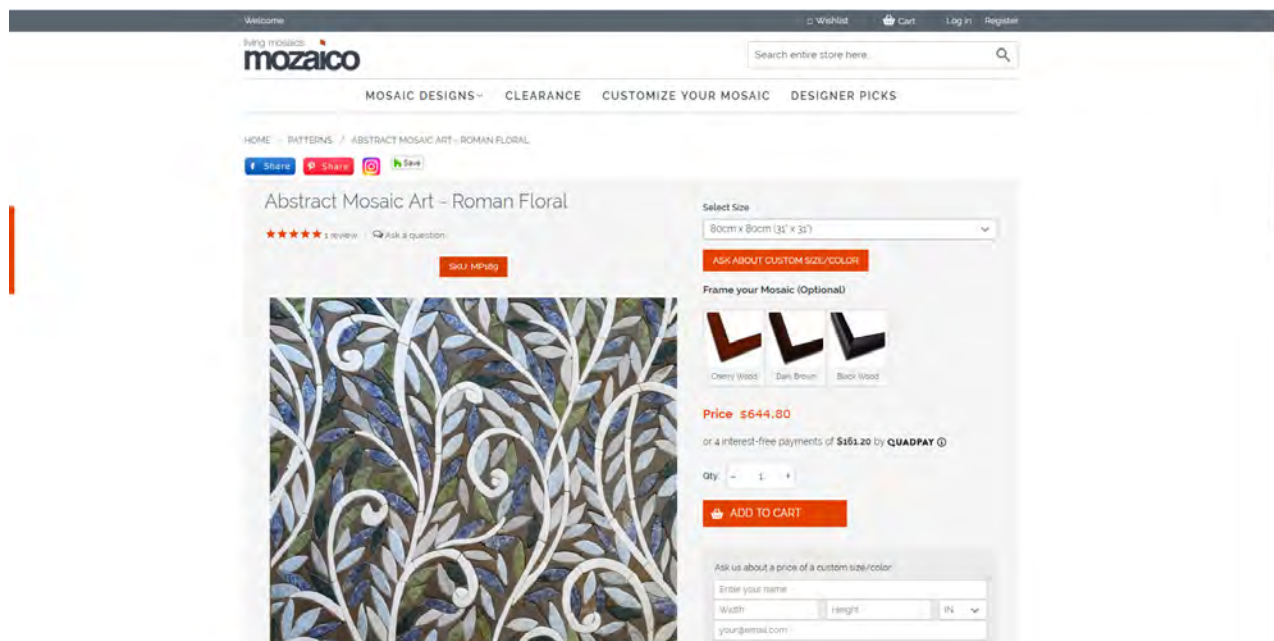


LINK:

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PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

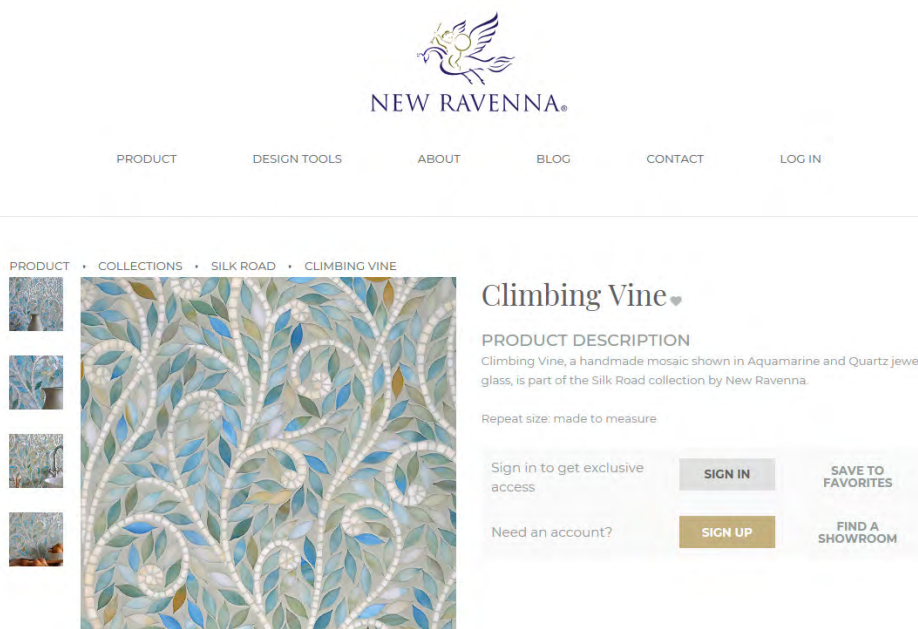
## MOZAICO VERSION



LINK:

<https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs-flowers-and-trees-abstract-mosaic-art-roman-floral-mp189>

## NEW RAVENNA VERSION - CLIMBING VINE

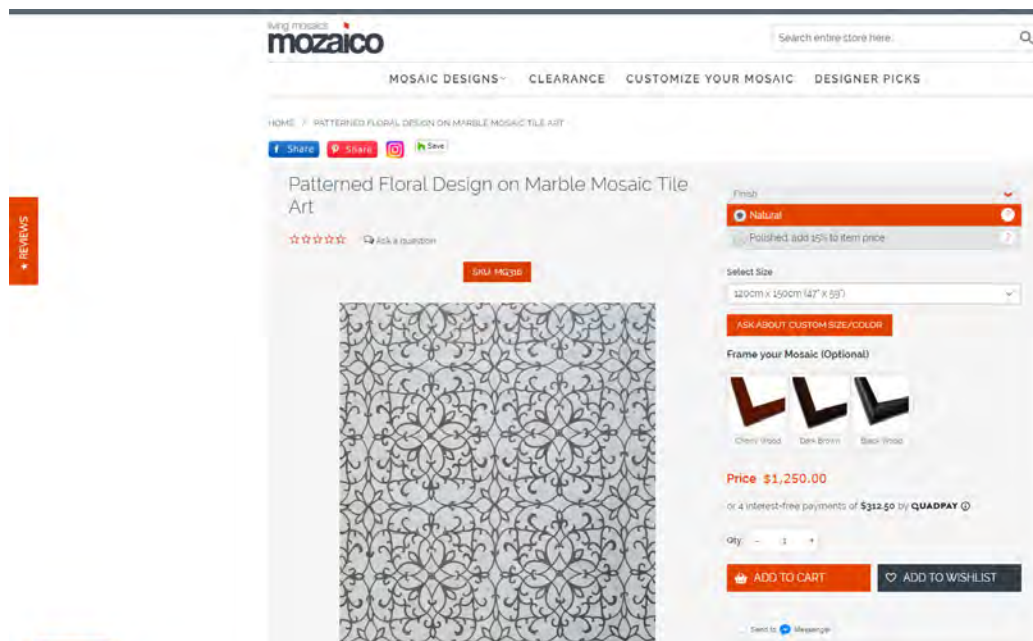


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PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

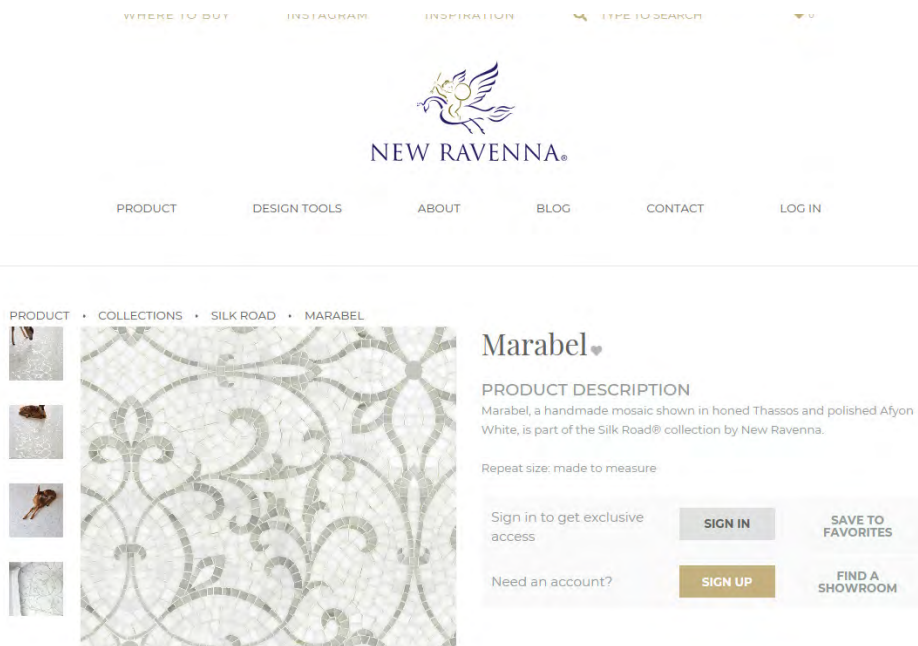
## MOZAICO VERSION



LINK:

[https://www.mozaico.com/products/mosaics-designs\\_patterns\\_patterned-floral-design-on-marble-mosaic-tile-art\\_mg316](https://www.mozaico.com/products/mosaics-designs_patterns_patterned-floral-design-on-marble-mosaic-tile-art_mg316)

## NEW RAVENNA VERSION - MARABEL



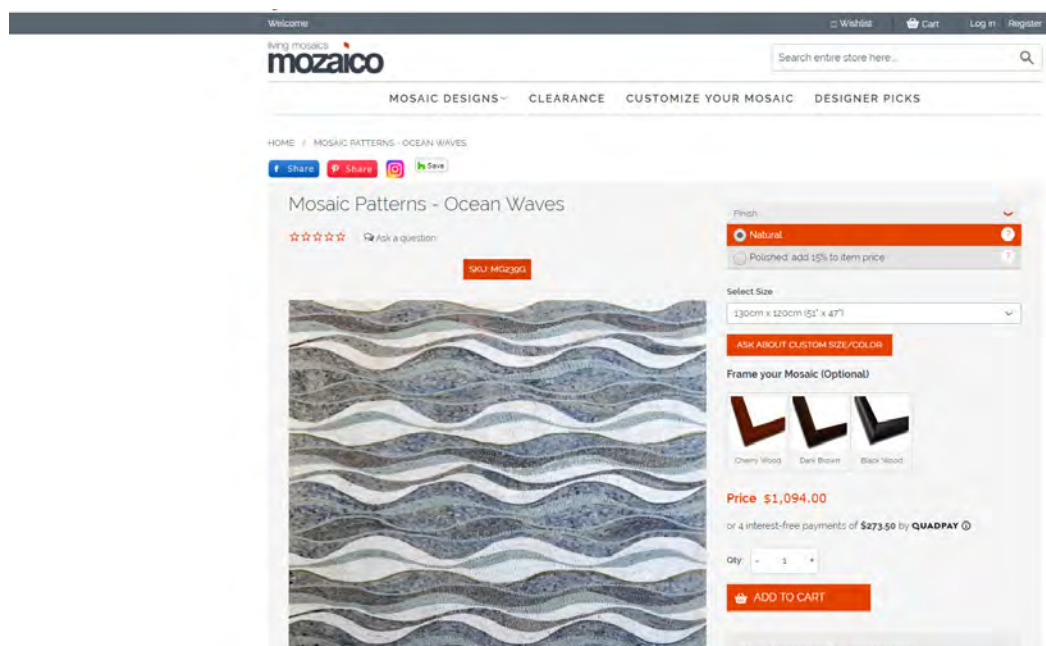
LINK:

<https://newravenna.com/nr-product/marabel/>



PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

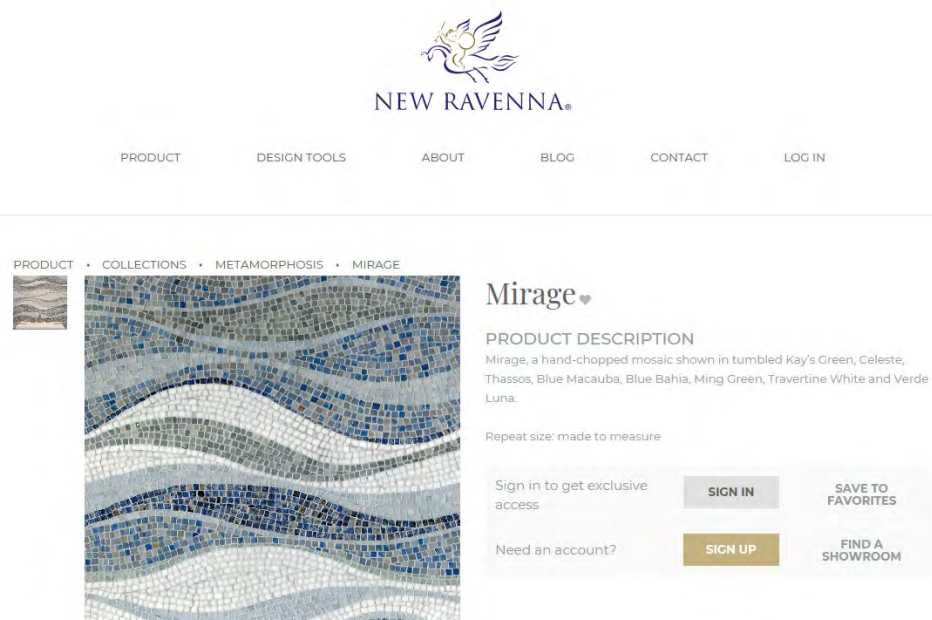
MOZAICO VERSION



LINK:

[https://www.mozaico.com/products/mosaics-designs\\_patterns\\_mosaic-patterns-ocean-waves\\_mg239g](https://www.mozaico.com/products/mosaics-designs_patterns_mosaic-patterns-ocean-waves_mg239g)

NEW RAVENNA VERSION - MIRAGE



LINK:

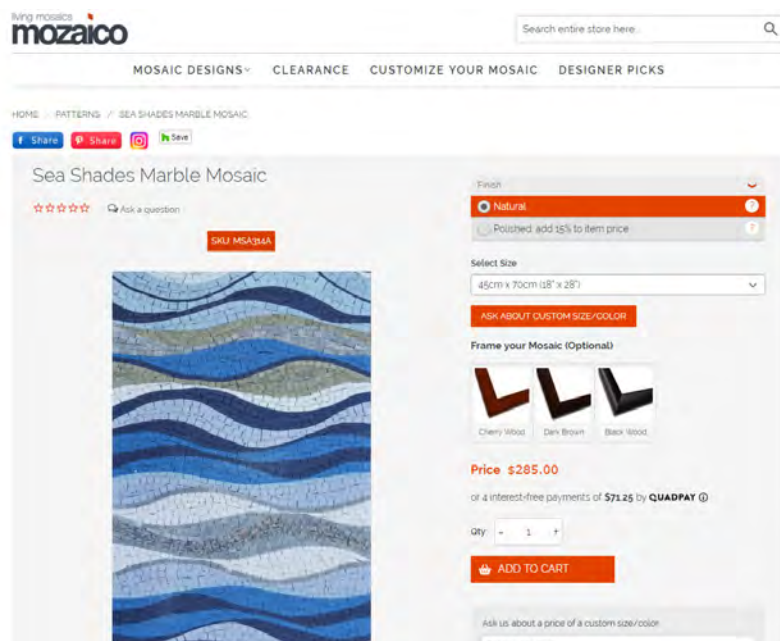
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PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

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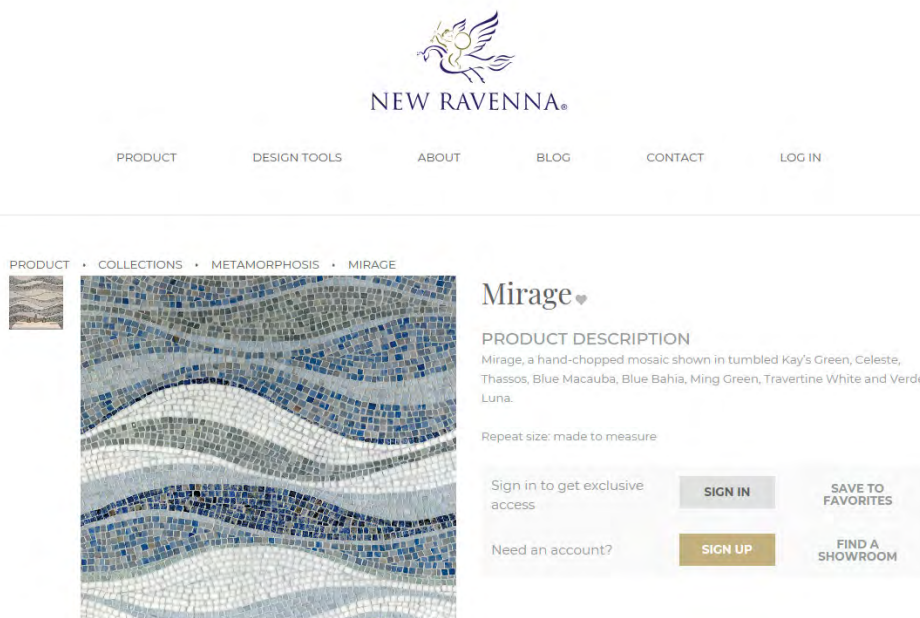
REVIEWS



LINK:

[https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs\\_patterns\\_sea-shades-marble-mosaic\\_msa314a](https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_patterns_sea-shades-marble-mosaic_msa314a)

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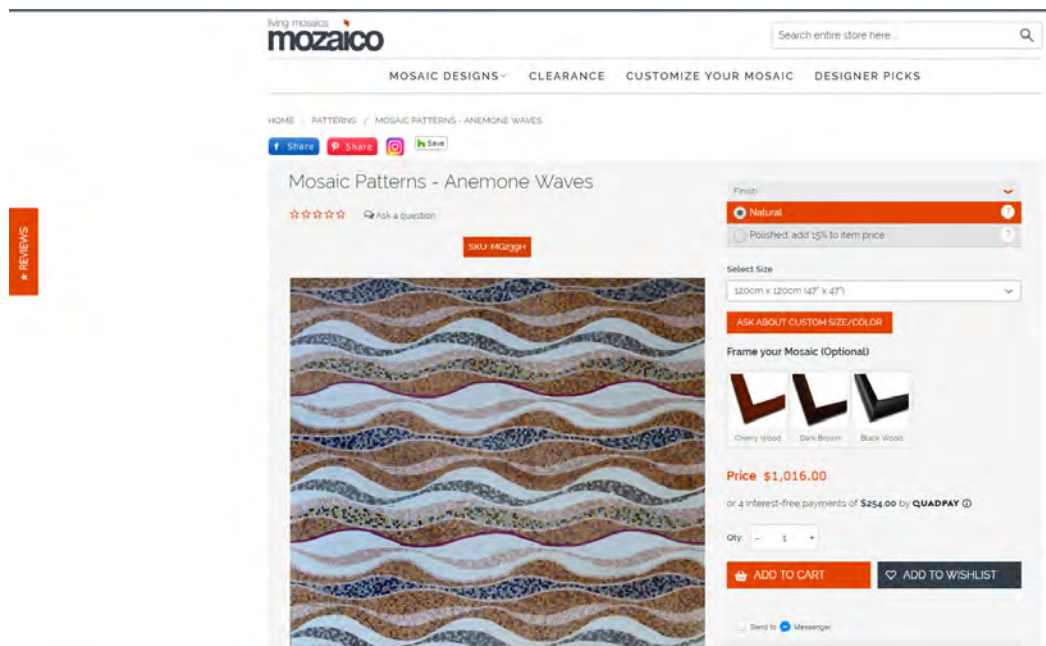


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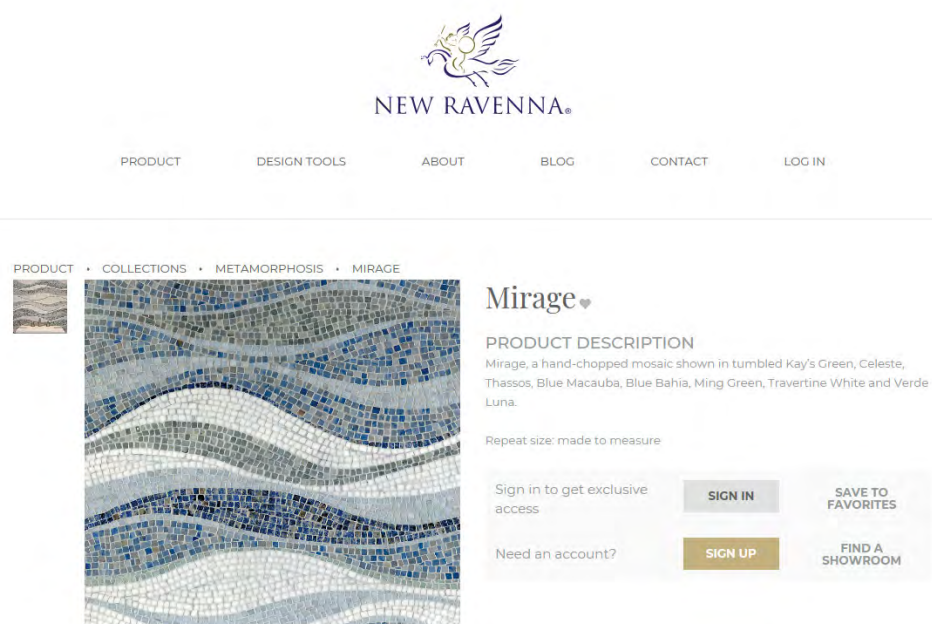
MOZAICO VERSION



LINK:

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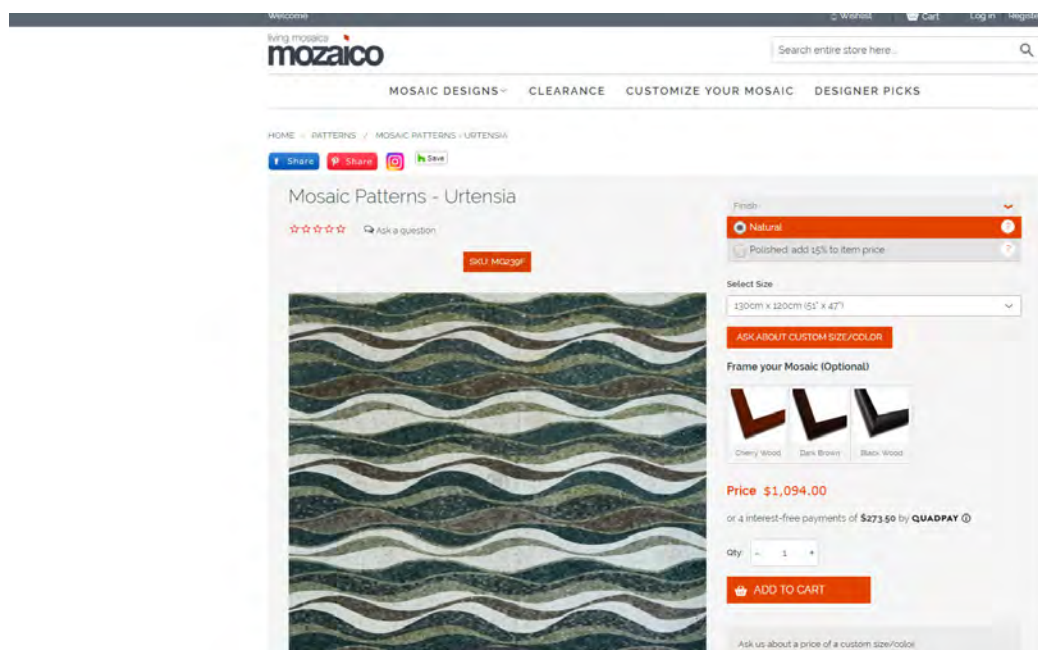


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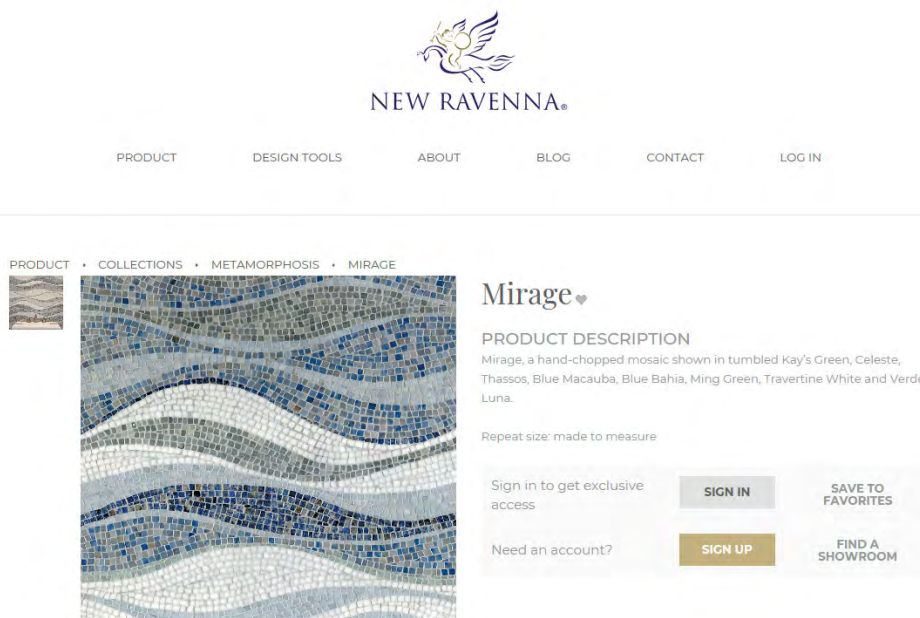
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LINK:

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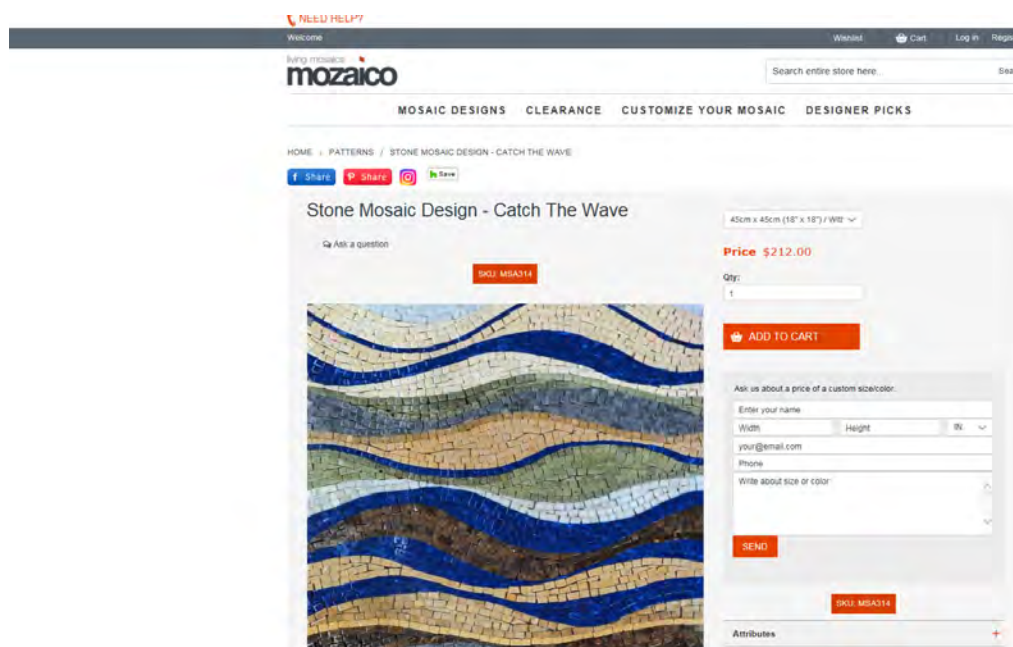
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PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

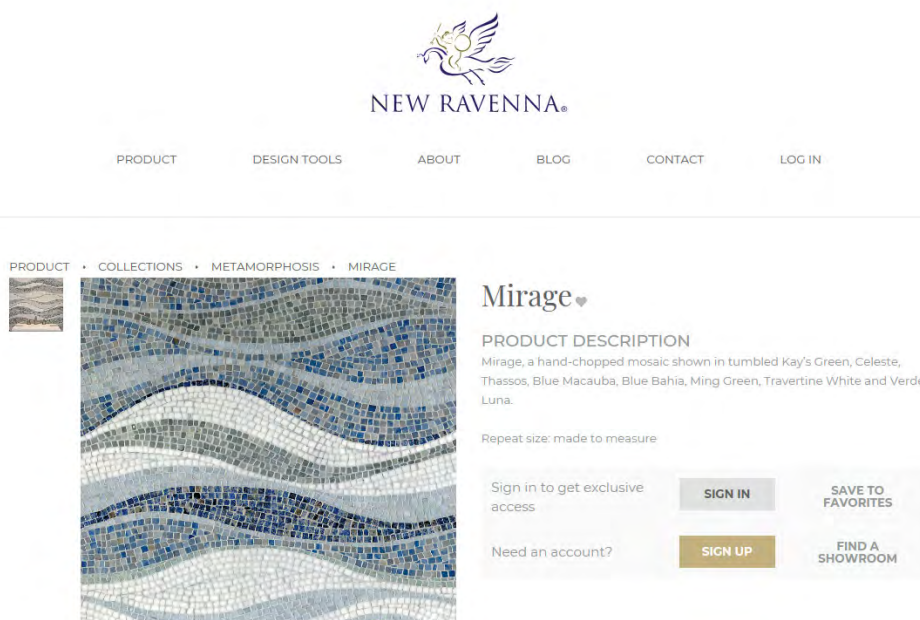
## MOZAICO VERSION



LINK:

[https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs\\_patterns\\_stone-mosaic-design-catch-the-wave\\_msa314](https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_patterns_stone-mosaic-design-catch-the-wave_msa314)

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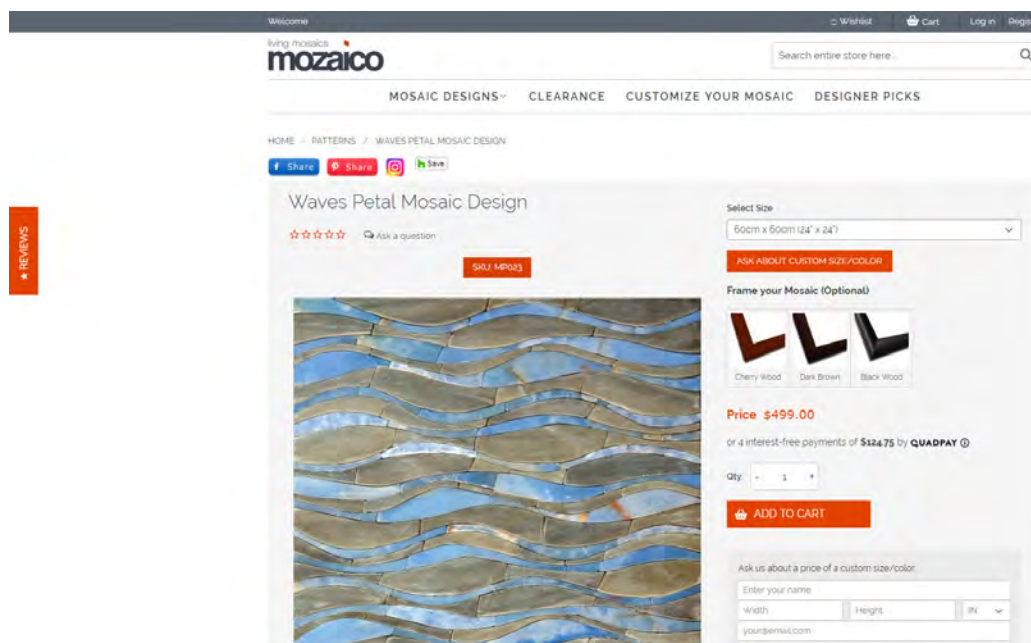
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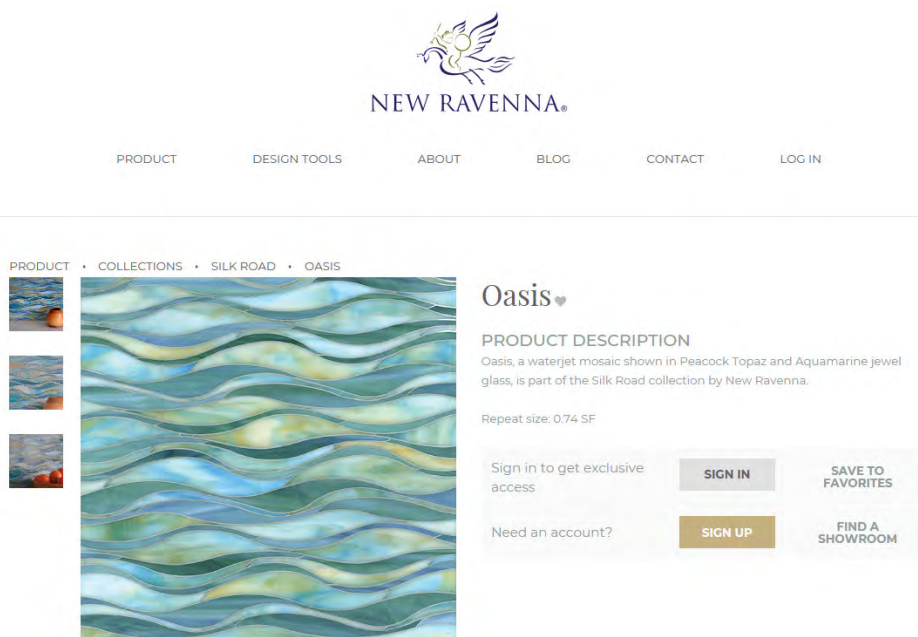
## MOZAICO VERSION



LINK:

[https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs\\_geometric\\_waves-petal-mosaic-design\\_mp023](https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_geometric_waves-petal-mosaic-design_mp023)

## NEW RAVENNA VERSION - OASIS

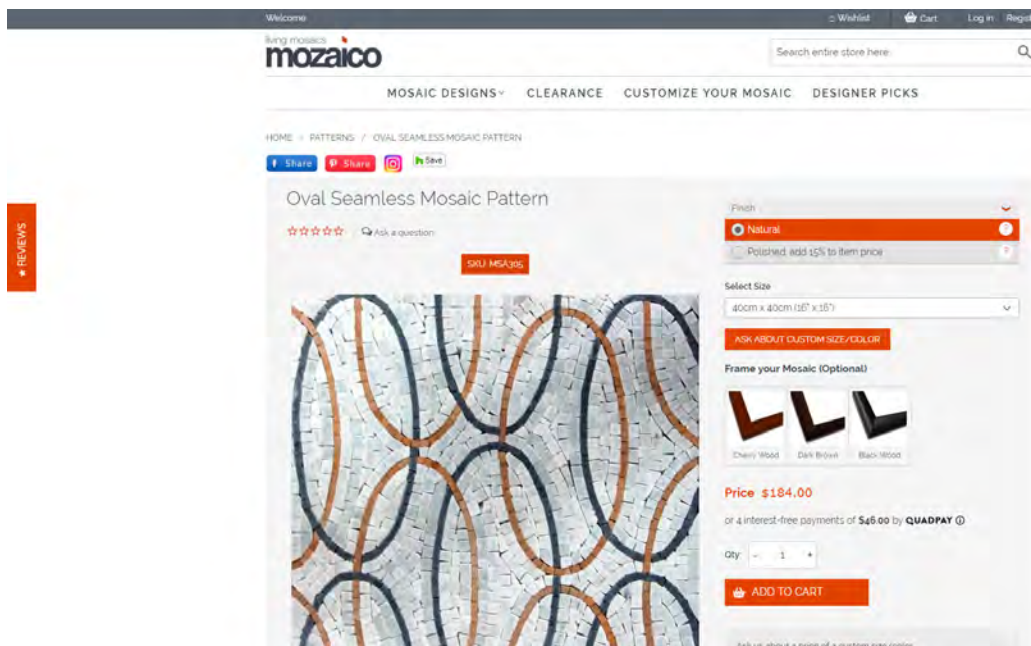


LINK:

<https://newravenna.com/nr-product/oasis-glass/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

## MOZAICO VERSION



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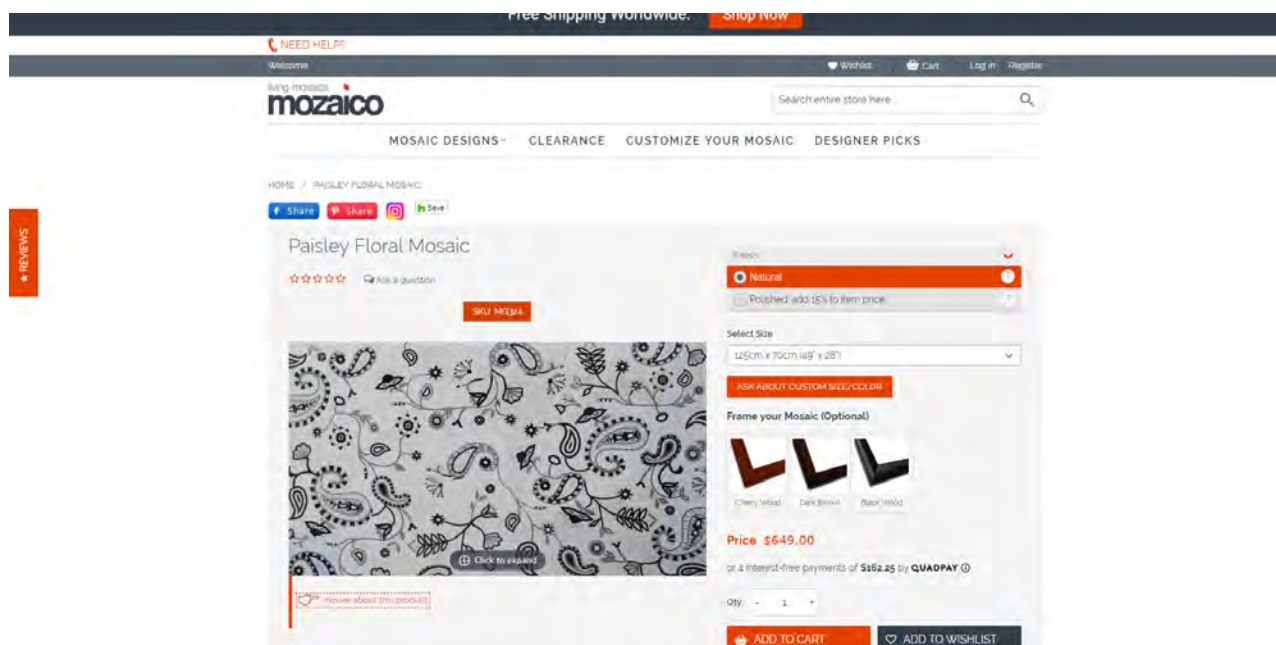
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## NEW RAVENNA VERSION - OVAL OVERLAY



PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

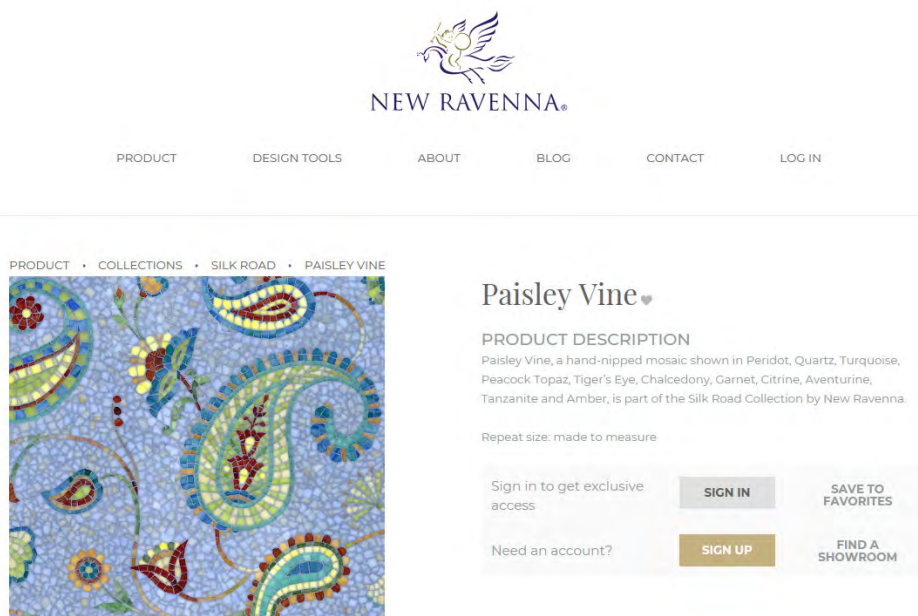
## MOZAICO VERSION



LINK:

[https://www.mozaico.com/products/mosaics-designs\\_patterns\\_paisley-floral-mosaic\\_mg324](https://www.mozaico.com/products/mosaics-designs_patterns_paisley-floral-mosaic_mg324)

## NEW RAVENNA VERSION - PAISLEY VINE



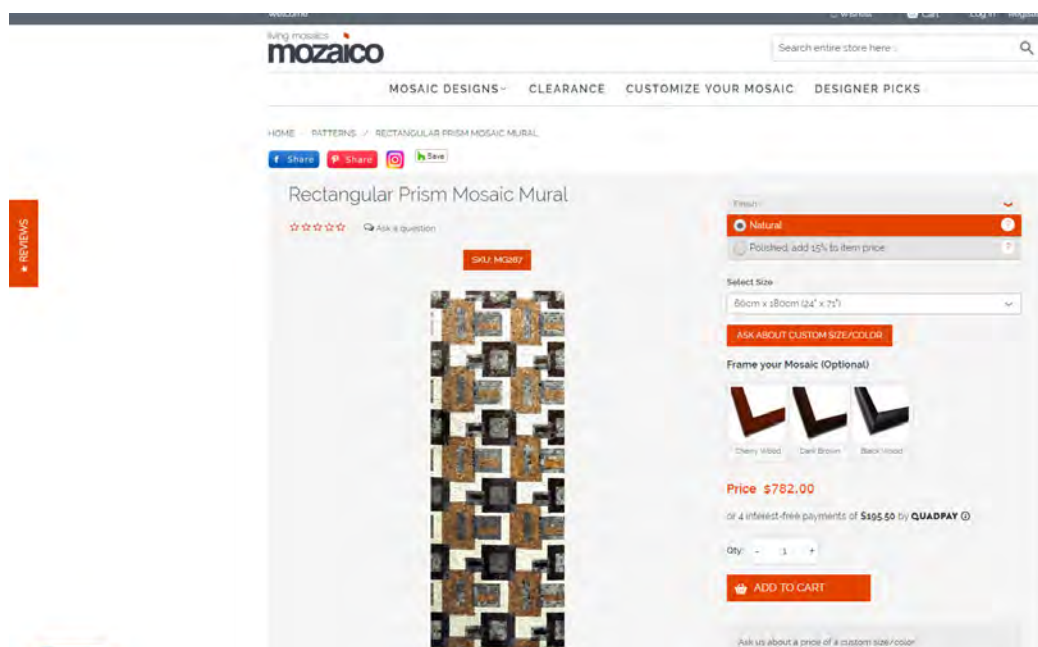
LINK:

<https://newravenna.com/nr-product/paisley-vine/>



PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

## MOZAICO VERSION



LINK:

[https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs\\_patterns\\_rectangular-prism-mosaic-mural\\_mg287](https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_patterns_rectangular-prism-mosaic-mural_mg287)

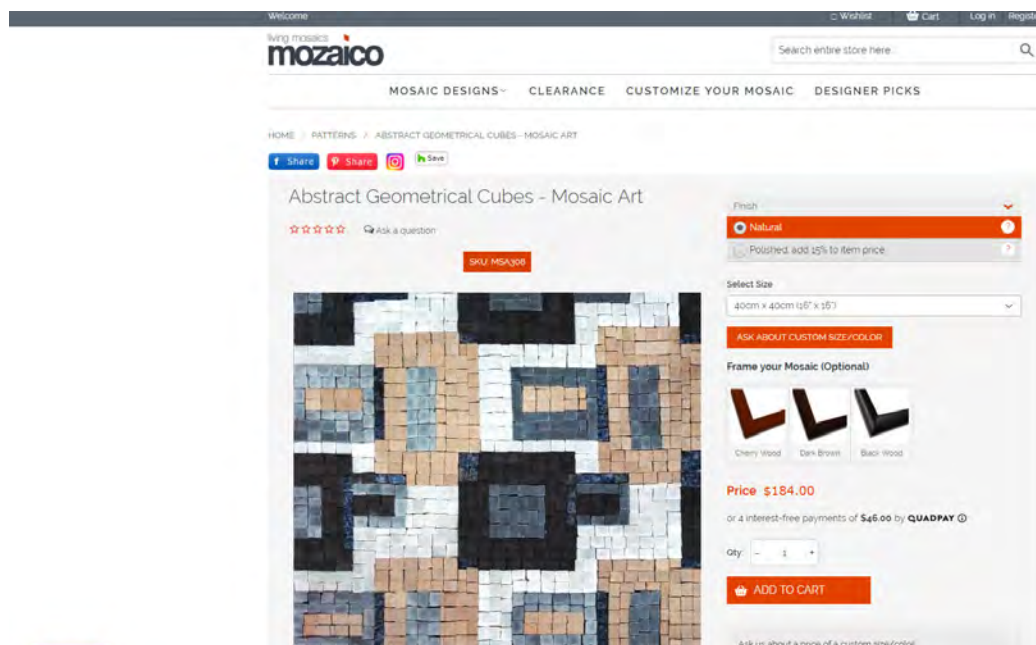
## NEW RAVENNA VERSION - RAZMATAZZ





PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

## MOZAICO VERSION



LINK:

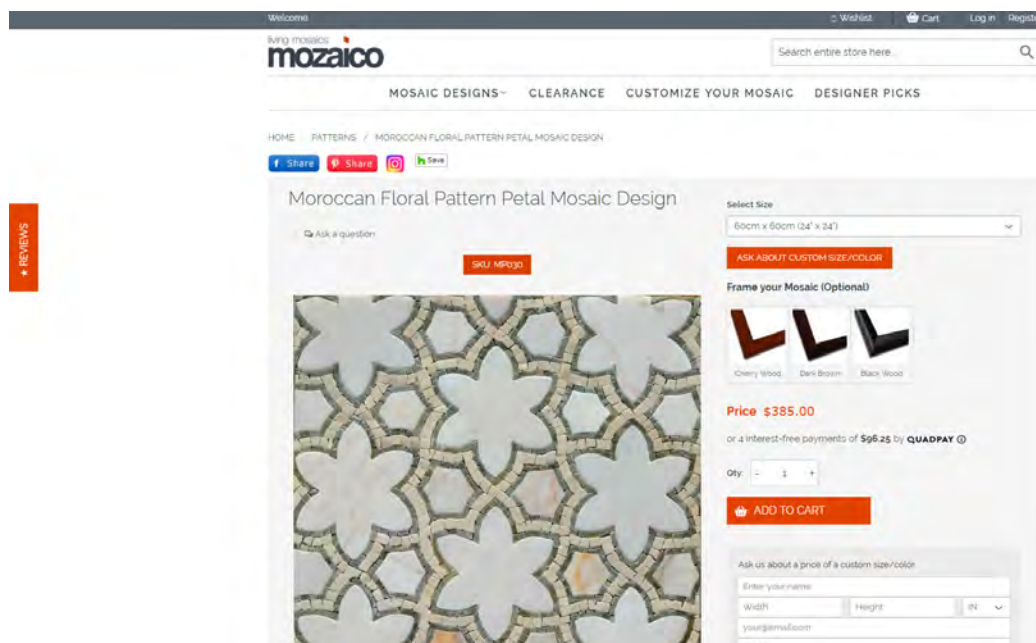
[https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs\\_patterns\\_round-floral-mosaic-gabriela\\_msa308](https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_patterns_round-floral-mosaic-gabriela_msa308)

## NEW RAVENNA VERSION - RAZMATAZZ



PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

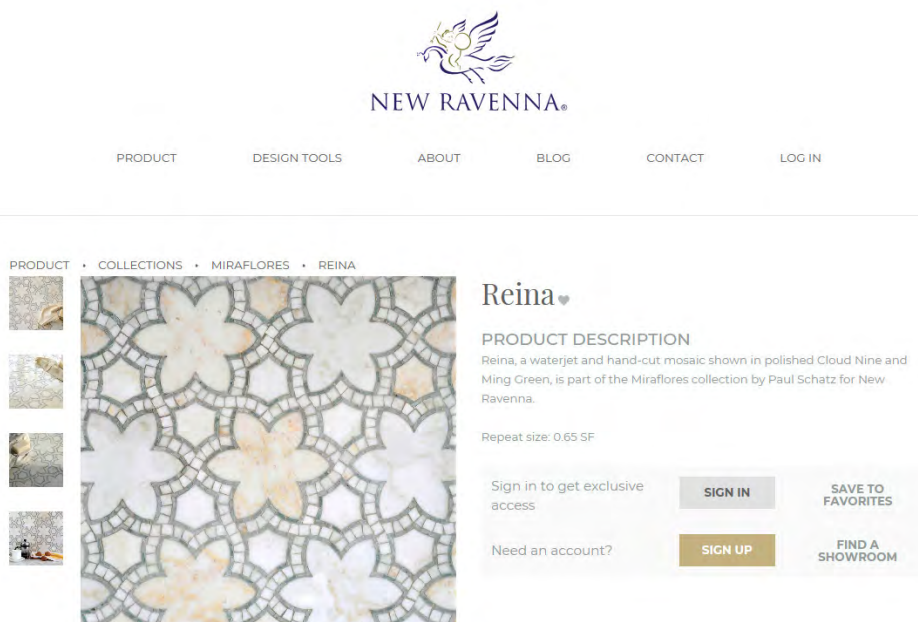
## MOZAICO VERSION



LINK:

[https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs\\_geometric\\_moroccan-floral-pattern-petal-mosaic-design\\_mp030](https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_geometric_moroccan-floral-pattern-petal-mosaic-design_mp030)

## NEW RAVENNA VERSION - REINA

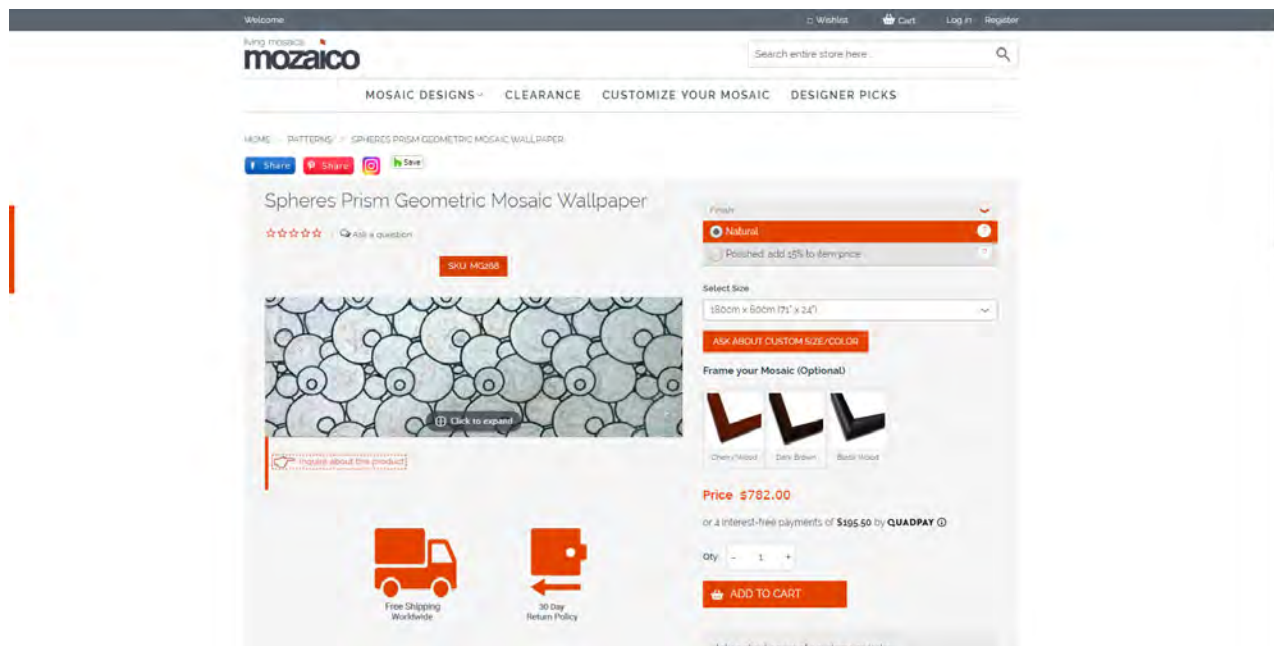


LINK:

<https://newravenna.com/nr-product/reina-cloud-nine/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

MOZAICO VERSION



LINK:

[https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs\\_patterns\\_spheres-prism-geometric-mosaic-wallpaper\\_mg288](https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_patterns_spheres-prism-geometric-mosaic-wallpaper_mg288)

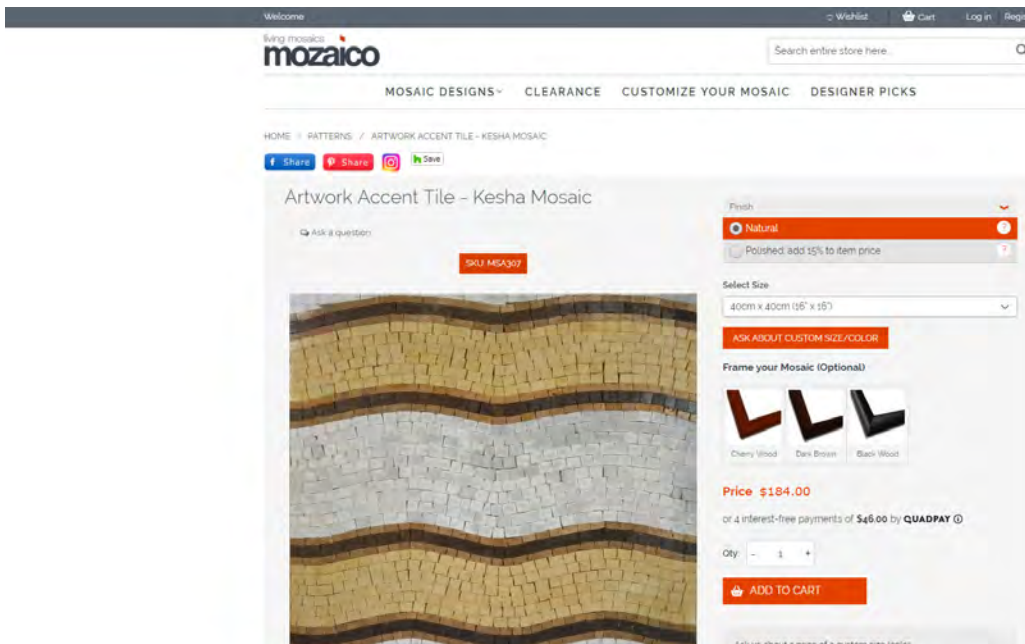
NEW RAVENNA VERSION - RINGLET





PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

## MOZAICO VERSION



LINK:

[https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs\\_patterns\\_artwork-accent-tile-kesha\\_msa307](https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_patterns_artwork-accent-tile-kesha_msa307)

## NEW RAVENNA VERSION - SINE WAVE







William R. Poynter, Esq.  
757-238-6383  
wpoynter@kaleolegal.com

November 9, 2022

**VIA UPS**

Shady Tawil, CEO  
MOZAICO, INC.  
1591 Lighthouse Drive  
Naperville, Illinois, 60565  
[info@mozaico.com](mailto:info@mozaico.com)

With a copy to:  
Legalinc Corporate Services Inc.  
651 N. Broad Street.  
Suite 201  
Middletown, DE 19709

**Re: Willful Trademark and Copyright Infringement**

Dear Sir:

This firm represents New Ravenna, which is America's premier designer and manufacturer of stone and glass mosaic tiles for both residential and commercial installations. New Ravenna mosaic tile designs are sold through nearly 200 exclusive designer showrooms across the country and internationally, and the company provides design services along with on-site supervision of installations. New Ravenna mosaics have been featured in national architectural and interior design magazines and are found in homes, restaurants, hotels, casinos and businesses around the world.

New Ravenna is the exclusive owner of all copyrights and other intellectual property rights in the mosaic tile designs and marks that appear on the New Ravenna website at [www.newravenna.com](http://www.newravenna.com) ("New Ravenna Designs"). As a result of New Ravenna's exclusive and widespread advertising, use and promotion over more than twenty years, the New Ravenna Designs are widely recognized by consumers as a designation of New Ravenna's goods and services, and New Ravenna has developed extensive goodwill in its New Ravenna Designs. What is more, New Ravenna created and registered five designs: Chinoiserie, Reina, Avila, Stratum, and Reptile (collectively the "Copyrighted Works"). Plaintiff is the owner of valid and subsisting United States Copyright Registration Nos. VA0002111243, VA0002111244, VA0002111246, VA0002164004, VA0002085265, VA0002318549, and VA0002321306, which, respectively, cover the Copyrighted Works.

New Ravenna has previously informed you of your infringement of several of its copyrighted designs on multiple occasions dating back as early as May 12, 2015. Unfortunately, it has yet again come to our attention that you are offering a multitude of mosaic tile designs that are identical and/or substantially similar to many of the New Ravenna Designs, through a number of online websites in addition to your own. **Exhibit A.** In light of your repeated use of New Ravenna designs, despite multiple similar letters from New Ravenna in the past demanding that you cease and desist from using the infringing designs, New Ravenna has filed the enclosed Complaint in

November 9, 2022  
Mozaico  
Page 2

the Eastern District of Virginia, Norfolk Division, Case Number 2:22-cv-465. **Exhibit B.** In the Complaint, among other remedies, New Ravenna seeks preliminary and permanent injunctive relief against further infringement, an award of Mozaico's profits, an award of actual or statutory damages, and an award of its reasonable attorneys' fees and costs. New Ravenna is not serving the complaint at this time, but merely providing you with a courtesy copy for reference. New Ravenna prefers to avoid litigation at this time, but it cannot permit this continued infringement to persist.

In addition, in light of New Ravenna's claims, at this time we hereby demand that Mozaico, Inc. and its affiliates and any and all officers, employees, members, managers, consultants, agents, attorneys, and representatives, take action to preserve all potentially relevant documents and information, regardless of the form in which it is stored, and electronically stored information and to prevent the intentional or accidental deletion or spoliation of any evidence that in any manner relates to this case and the allegations that have been raised.

New Ravenna has attempted to resolve these matters with you on several occasions. We request that you contact us as soon as possible to discuss resolution of this matter. If this matter is not resolved by December 1, 2022, New Ravenna will assume that you do not wish to resolve this matter outside of litigation and will formally serve you with a copy of the Complaint.

Very truly yours,



William R. Poynter

cc: New Ravenna, LLC

## EXHIBIT C



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mozaico Step Into A World Of Vibrant Beauty! Explore This Captivating Floral Pattern Mosaic Art & Find Yourself Lost In Its Intricate Details. ✨🌸





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#mozaico #mosaics #mosaicartwork #mosaicartist #mozaics #mozaika #mozaicwallart #mosaicdesigns #mosaicworkshop #wallart #tileart #tiledesign #stoneart #artwork #artoftheday #handmade #handmadeart #homedecor #inspirationalart #inspireart #mosaiclover #art #design #patterns #floral #flower #patternndesign #floraldesign #simplicity #artistic

Edited · 5w



77 likes

JULY 1

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## EXHIBIT D



**Mozaico Art**  
July 1 · 🌐

Step Into A World Of Vibrant Beauty! Explore This Captivating Floral Pattern Mosaic Art & Find Yourself Lost In Its Intricate Details. ✨🌸

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